

EPA REGISTRATION
FILE JACKET
REG #5905-577



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs

Registration Division (7505C)

1200 Pennsylvania Ave., N.W.

Washington, D.C. 20460

EPA Reg. Number:

5905-577

Date of Issuance:

JAN 28 2008

NOTICE OF PESTICIDE:

☒ Registration☐ Reregistration

(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Heleclopid Seed Treatment

Name and Address of Registrant (include ZIP Code):

Helena Chemical Company
225 Schilling Boulevard, Suite 300
Collierville, Tennessee 38017

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.
2. Make the following label changes before you release the product for shipment:
 - a. Revise the EPA Registration Number to read, "EPA Reg. No. 5905-577".
 - b. Within the table on page 6 of the label, revise "*Wheat, Barley, Wheat, Barley, Oats, Rye, Triticale*" to read "*Wheat, Barley, Oats, Rye, Triticale*."
 - c. Revise the header **Wheat, Barley, Wheat, Barley, Oats, Triticale: (For End-Use Application at Agricultural Establishments)** to read "*Wheat, Barley, Oats, Triticale: (For End-Use Application at Agricultural Establishments).*"

Signature of Approving Official:

Kable Bo Davis, Entomologist

Insecticide-Rodenticide Branch, Registration Division (7505P)

Date:

JAN 28 2008

- d. Within the **Wheat, Barley, Oats, Triticale: (For End-Use Applications at Agricultural Establishments)** section of the label, include the statement *"Do not graze or feed livestock on treated areas for 45 days after planting."*
 - e. Within the **Sorghum: For End-Use Application at Agricultural Establishments** section of the label, revise the sentence *"Do not graze or feed livestock on treated areas of 45 days after planting."* to read *"Do not graze or feed livestock on treated areas for 45 days after planting."*
 - f. Within the **Notes and Restrictions** section of the label for sugar beets (commercial seed treatment), revise *"If applying to non-pelleted raw seed, do not exceed 2.4 fluid ounces per 100,000 (approx. 1 kg by weight)."* to read *"If applying to non-pelleted raw seed, do not exceed 2.4 fluid ounces per 100,000 seeds (approx. 1 kg by weight)."* In addition, add the statement *"If rates exceed 2.4 fluid ounces per unit, seed must be pelleted."*
 - g. Within the **CONDITIONS OF SALE-LIMITED WARRANTY AND LIMITATION OF LIABILITY AND REMEDIES** section of the label, revise the sentence *"The directions on this label are believed to be reliable and should be followed carefully."* to read *"The directions on this label are believed to be reliable and must be followed carefully."*
 - h. Within the **CONDITIONS OF SALE-LIMITED WARRANTY AND LIMITATION OF LIABILITY AND REMEDIES** section of the label, revise the sentence *"The Company makes no other warranties or representations of any kind express..."* to read *"To the extent consistent with applicable law, the Company makes no other warranties or representations of any kind express..."*
 - i. Within the **CONDITIONS OF SALE-LIMITED WARRANTY AND LIMITATION OF LIABILITY AND REMEDIES** section of the label, revise the sentence *"To the extent allowed by law, the Company shall not be liable and any..."* to read *"To the extent consistent with applicable law, the Company shall not be liable and any..."*
3. The data requirements for storage stability (830-6317) and corrosion characteristics (830- 6320) have not been satisfied, and must be submitted within eighteen months of the date of this letter.
 4. Submit one copy of the revised final printed label for the record before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

Helecloprid

ACCEPTED
with COMMENTS
In EPA Letter Dated:

JAN 28 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

ACTIVE INGREDIENT:

Imidacloprid.....48.7%

OTHER INGREDIENTS:.....51.3%

TOTAL.....100.0%

*Contains 5 pounds active per gallon (600 grams per liter) @ 20°C.

KEEP OUT OF REACH OF CHILDREN

CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See Inside for Additional Precautionary Statements. Read the entire label before using this product. Use only according to label instructions.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Caution: Harmful if inhaled. Harmful if swallowed. Avoid breathing spray mist. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contact with eyes or clothing. Wear protective eyewear, long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as polyethylene, polyvinylchloride (PVC) or viton.

PERSONAL PROTECTIVE EQUIPMETN (PPE):

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category C on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear: long-sleeved shirt and long pants, socks, shoes, protective eyewear and chemical-resistant gloves (such as nitrile, butyl, neoprene, barrier laminate, polyvinyl chloride or Viton). Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE Separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- * Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- * Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- * Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

FIRST AID	
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact (800) 424-9300, collect day or night, for emergency medical treatment information.	

ENVIRONMENTAL HAZARDS

This product is highly toxic to birds and aquatic invertebrates. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Cover or incorporate spilled treated seeds.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

For use in commercial seed treaters only, with the exception of application to canola, cotton (delinted seed), field corn, sorghum, wheat and barley, which may be made either by commercial seed treatment or as an end-use seed treatment on agricultural establishments at, or immediately before, planting. This product is to be used in liquid or slurry treaters.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations.

Mix thoroughly before use or use entire container at one time. All tank mixes should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval and notification to workers (as applicable). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

Exception: If the seed is treated with the product and the treated seed is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated. PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is

Coveralls

Chemical-resistant gloves made of any waterproof material such as, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

Shoes plus socks

Protective eyewear

ROTATIONAL CROPS

Treated areas may be replanted with any crop specified on an imidacloprid label, or any crop for which a tolerance exists for the active ingredient, as soon as practical following the last application. The following plant-back should be observed for listed crops:

ROTATIONAL PLANT-BACK INTERVALS*				
IMMEDIATE PLANT-BACK				30-DAY PLANT-BACK
Artichoke	Eggplant	Oats	Sugarbeet	Cereals including: buckwheat millet rice Safflower
Barley	Ground cherry	Okra	Tomatillo	
Brassica (cole)	Leaf petiole	Pepinos	Tomato	
leafy vegetable	vegetable	Pepper	Triticale	
Canola	Leafy vegetable	Popcorn	Veg. Root and	
Cilantro	Legume	Potato	Tuber	
Corn, Field	vegetable	Rapeseed	Watercress	
Corn, Sweet	(succulent or	Rye	Wheat	
Cotton	dried, except	Sorghum		
Cranberry	soybean)	Soybean		
Cucurbits	Mustard Seed	Strawberry		
*Cover crops for soil building or erosion control may be planted any time, but do not graze or harvest for food or feed.				
*For all other crops not listed on an imidacloprid label, or for crops for which no tolerance for the active ingredient has been established, a 12-month plant-back interval should be observed.				

NOTIFICATION of the crop rotational restriction must be conveyed to the grower by appropriate seed tag labeling or bag printing on all seed units.

NOTE: The purchaser of this product is responsible for ensuring that all seed treated with this product are adequately dyed with a suitable color to prevent its accidental use as food for man or feed for animals. Refer to 21 CFR, Part 2.25. Any dye or colorant added to treated seed must be cleared for use under 40 CFR, Part 180.1001. Federal regulations have established official tolerances for certain pesticide residues. In order that residues on food and forage crops will not exceed established tolerances, use only at recommended rates.

Treated seed must not be used for or mixed with food or animal feed or processed for oil. Seed commercially treated with this product must be labeled in accordance with all applicable requirements of the Federal Seed Act.

Labels for commercially treated seed should include the following addition to the Environmental Hazards statements:

Exposed treated seed may be hazardous to birds. Dispose of all excess treated seed and seed packaging by burial away from bodies of water. Cover or incorporate spilled treated seeds.

USE RESTRICTION

Rape greens grown and harvested from this product's treated seed must not be used for human and feed consumption. Rapeseed grown and harvested from this product's treated seed is only for industrial uses and can not be used for edible oil or any other human/feed consumption.

Wheat, Barley, Oats, Rye Triticale, Sorghum: Do not graze or feed livestock on treated areas for 45 days after planting.

Cotton (delinted seed only): Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of 0.5 pound of imidacloprid per acre per cropping cycle.

Stored Seed Protection: Applied at labeled rates equal to or above 0.8 fluid ounce per hundredweight, this product will provide protection to seed against injury from the following insects: Indian Meal Moth (*Plodia interpunctella*), Rice Weevil (*Sitophilus oryzae*), Red Flour Beetle (*Tribolium castaneum*), and Lesser Grain Borer (*Rhizopertha dominica*). It is recommended that seed with existing populations of stored grain pests be fumigated prior to treating and bagging seed.

For Early Season Protection Against Certain Sucking Insects: This product will aid in the protection of seeds and seedlings against injury by certain early season insects.

Canola, rapeseed, mustard seed: To provide early season protection of seedlings against injury by aphids, flea beetles and wireworms apply as a commercial seed treatment at 10.24 to 25.6 fluid ounces per hundredweight of seed. In areas where flea beetles and foliar insects are in high numbers, the higher application rate is recommended. Please consult your local agricultural office for pest patterns, history, and forecasts to assist in determining the appropriate rate for your region.

For suppression of Lygus bugs, including *lygus spp.*, in their second generation and cabbage Seedpod Weevil larvae, including *Ceutorhynchus assimilis*, apply 15.36 to 25.6 fluid ounces per hundredweight of seed.

Canola, rapeseed, mustard seed: For End-Use Application at Agricultural Establishments: Apply using an HCBT or a Batch Treater. Shake this product thoroughly before use. Apply 5.1 to 12.8 fluid ounces of this product per 50 pound bag. This product may be diluted with an approved Helena Chemical Company fungicide mixture for extended disease protection. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

Field Corn: For the protection of corn plants from the corn insect pests listed below, apply as a seed treatment at the recommended rates listed.

PEST	THIS PRODUCT	
	MG.AI PER KERNEL	FLUID OUNCES PER 80,000 UNITS OF SEED
Corn root worm (including Northern, Western Southern and Mexican ¹)	1.34	6.0
Flea beetle		
Chinch bug		
Southern green stinkbug		
White grub		
Seed corn maggot		
Thrips		
Wireworm		
Corn leaf aphid		
Imported fire ant		
Southern corn leaf beetle		
Billbug ²		
Grape colaspis ²		
Black curworms ³		

PEST	THIS PRODUCT	
	MG.AI PER KERNEL	FLUID OUNCES PER 80,000 UNITS OF SEED
Flea beetle Chinch bug Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Grape Colaspis ² White grub	0.60	2.70

PEST	THIS PRODUCT	
	MG.AI PER KERNEL	FLUID OUNCES PER 80,000 UNITS OF SEED
Seed corn maggot (seed protection only) Wireworm (seed protection only) Flea beetle (through 1 leaf stage) Imported fire ant White grub ⁴	0.16	0.72

1In areas of heavy to severe corn rootworm populations, protection will not be adequate. Use only in areas of light to moderate corn rootworm populations. Consult your State Agricultural Extension Service on levels of corn rootworm populations.

2Reduces early season feeding damage.

3Will reduce feeding damage caused by leaf feeding black cutworms that are ½ inch or less in length.

4Reduces feeding damage during emergence and seedling stages.

Field Corn: For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute this product with water and/or an approved Helena Chemical Company fungicide mixture. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50 pound bag of seed. Treat one-half of slurry mix. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50 pound bag of seed following the product application and allow it to distribute evenly on the seed.

Wheat, Barley, Oats, Rye Triticale: To provide early season protection of seedlings against injury by aphids, (including Bird cherry-oat, English grain, Greenbug and Russian wheat aphid), Hessian fly, apply 0.8 to 2.4 fluid ounces per hundredweight of seed prior to planting as a slurry treatment. For low use rate for "wireworm-only" protection; use this product applied at the 0.13 to 0.26 fluid ounce per hundredweight of seed offers suppression of wireworm activity on seed and young seedlings. To provide early season protection from grasshopper damage, this product should be applied to seed at 1.2 to 2.4 fluid ounces per hundredweight. To reduce early season damage caused by grasshopper, this product's treated seed may be planted as a 50 to 60 foot border around the edges of the field. Consult your local university extension entomologist for details regarding grasshopper control in your area. For maximum effectiveness, seed should be treated uniformly. Use the higher rate to provide increased length of protection and from heavy insect pressure and from wireworms, and to reduce potential spread of Barley yellow dwarf virus due to aphid vectors. Do not graze or feed livestock on treated areas for 45 days after planting.

Wheat Barley, Oats, Rye, Triticale: For End-Use Application at Agricultural Establishments: Apply using a Total Slurry Treater (TST), Farmer Applied Seed Treater (F.A.S.T.), Farmer Air Pressure System (FAP) or other on-farm seed treating equipment to deliver accurate rates of this product to achieve optimum product performance. Apply 0.8 to 2.4 fluid ounces per hundredweight of seed. This product should be combined with a Helena Chemical Company fungicide product for seed and seedling protection against fungal pathogens as well as insect pests. Dilution with water may be necessary depending on fungicide formulation used. This product may also be applied on-farm as an over-treatment to seed pretreated with a fungicide. In this case, dilution is necessary. Do not graze or feed livestock on treated areas for 45 days after planting.

Sorghum: To provide early season protection of seedlings against injury by Aphids (including Corn leaf, English grain, Greenbug, and Yellow sugar cane aphid), Chinch bugs, Fire ants and Wireworms, apply 6.4 fluid ounces per hundredweight of seed prior to planting as a slurry treatment. Ensure thorough coverage. Do not graze or feed livestock on treated areas for 45 days after planting.

Sorghum: For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute 3.2 fluid ounces of this product with water. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50-pound bag of seed following the product application and allow it to distribute evenly on the seed. Do not graze or feed livestock on treated areas of 45 days after planting.

Cotton (Delinted Seed Only) To provide protection of seedlings against injury by early season thrips and aphids, and where the specific application rate is desired on an individual seed basis, apply at 0.375 mg. ai. per seed (do not apply more than 12.8 fluid ounces per hundredweight of seed) prior to planting as a slurry treatment so as to ensure thorough coverage. Otherwise, apply at 12.8 fluid ounces per hundredweight of seed. Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of 0.5 pound of imidacloprid per acre per cropping cycle.

Cotton (Delinted Seed Only): For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute 6.4 fluid ounces of this product with water or a ready-to-use fungicide mixture, such as RTU-VITAVAX-Thiram or ALLEGIANCE-FL, for each 50-pound bag of cottonseed to be treated. The final slurry should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

Sugar Beets: To provide early season protection of seedlings against injury by Whitefly, Aphids, Leafhoppers (including to reduce potential for spread of Curly top and Yellow mosaic virus due to aphid and leafhopper vectors), Root aphids, Thrips and Wireworms, apply as a commercial seed treatment at 2.4 to 5.0 fluid ounces of this product in or on a unit of pelleted sugar beet seed with a weight ratio of 2:1 pelleting mixture to raw seed (seed count 100,000 seed – approximately 1 kilogram by weight) at a rate of 2.4 fluid ounces per unit of seed. If rates exceed 2.4 fluid ounces per unit, seed must be pelleted.

Sweet Corn: For the protection of sweet corn plants from the insect pests listed below, apply as a seed treatment at the recommended rates listed.

PEST	PRODUCT FLUID OUNCES/ CWT. OF SEED
Flea beetle Early season corn leaf aphid Seed corn maggot Wireworm	6.4
Imported fire ant Early season corn leaf aphid Seed corn maggot Wireworm	3.2 to 6.4
Imported fire ant Seed corn maggot (seed protection) Wireworm (seed protection)	1.6 to 3.2
Wireworm (seed protection)	0.8 to 1.6

The final slurry rate should be adjusted to apply a rate of 16 to 20 fluid ounces of diluted solution per hundredweight of seed with commercial equipment.

Popcorn: To provide early season protection of seedlings against injury by flea beetles, apply as a commercial seed treatment at 6.4 fluid ounces per hundredweight of seed.

Soybean: For protection of planted seeds from damage caused by seed corn maggot, to reduce feeding damage caused by soybean aphids and over-wintering bean leaf beetles, and to help suppress the spread of certain viruses, apply 1.6 to 3.2 fluid ounces per hundredweight of seed. Use higher rates to provide increased length of protection and for heavy insect pressure. This product can be used as an overtreatment. Do not graze or feed livestock on soybean forage or hay.

Adzuki Bean, Asparagus Bean, Broad Bean (Succulent or Dry), Catjang Bean, Chinse Longbean, Field Bean, Guar Bean, Jackbean, Kidney Bean Labtab Bean, Lima Bean (Succulent or Dry), Moth Bean (Succulent or Dry), Mung Bean, Navy Mean, Pinto Bean, Rice Bean, Runner Bean, Snap Bean Sword Bean, Tepary Bean, Urd Bean, Wax Bean, Yardlong Bean, Blackeyed Pea (Succulent or Dry), Chickpea, Cowpea (Succulent or Dry), Crowder Pea, Dwarf Pea, Edible-Pod Pea, English Pea, Field Pea, Garden Pea, Preen Pea, Pigeon Pea (Succulent or Dry), Snow Pea, Southern Pea (Succulent or Dry), Southern Pea (Succulent or Dry), Sugar Snap Pea, Grain Lupin, Sweet Lupin, White Lupin, White Sweet Lupin, Lentil:* To provide early season protection of seedlings against injury by wireworm, bean leaf beetle, imported fore ant and aphid, apply as a commercial seed treatment at 1.6 to 3.2 fluid ounces per hundredweight of seed prior to planting.

***Seed-and-pod vegetable seed treated in California must be destined for planting in states other than California and is not to be planted in California.**

Carrot: To provide early season protection of seedlings against injury by seed corn maggot and wireworm, apply as a commercial seed treatment at 6.4 fluid ounces per hundredweight of seed.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool place. Do not store in direct sunlight. Protect from freezing temperatures.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE-LIMITED WARRANTY AND LIMITATION OF LIABILITY AND REMEDIES

Read the Conditions of Sale - Warranty and Limitations of Liability and Remedies before using this product. If the terms are not acceptable, return the product, unopened, and the full purchase price will be refunded.

The directions on this label are believed to be reliable and should be followed carefully. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions or the failure to follow the label directions or good application practices, all of which are beyond the control of Helena Chemical Company (the "Company") or seller. In addition, failure to follow label directions may cause injury to crops, animals, man or the environment. The Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions for use subject to the factors noted above which are beyond the control of the Company. The Company makes no other warranties or representations of any kind express or implied, concerning the product, including no implied warranty of merchantability or fitness for any particular purpose, and no such warranty shall be implied by law.

The exclusive remedy against the Company for any cause of action relating to the handling or use of this product shall be limited to, at Helena Chemical Company's election, one of the following:

1. Refund of the purchase price paid by buyer or user for product bought, or
2. Replacement of the product used

To the extent allowed by law, the Company shall not be liable and any and all claims against the Company are waived for special, indirect, incidental, or consequential damages or expense of any nature, including, but not limited to, loss of profits or income. The Company and the seller offer this product and the buyer and user accept it, subject to the foregoing conditions of sale and limitation of warranty, liability and remedies.

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"Pace, Scott"
<PaceS@helenachemical.com>

01/28/2008 08:16 AM

To Kable Davis/DC/USEPA/US@EPA

cc

bcc

Subject 5905-LTT Helecloprid Seed Treatment

Bo:

Thank you for calling me this morning. Please find the label with the corrected to match the rest of the package Helecloprid.

Thank you

Scott A. Pace

**Manager:Registration Department
Helena Chemical Company
Tel# 901-752-4410**



Helecloprid 1-28-08 correction.doc

Product ingredient source information may be entitled to confidential treatment

DATE OUT: 22/JAN/2008

FEE; SUBJECT: PRODUCT CHEMISTRY REVIEW OF: AN End-Use Product [X]
DP BARCODE#: D347917 EPA RECEIVED DATE: 28/DEC/2007 REG NO.:5905-LTT
PRODUCT NAME: Helacloprid Seed Treatment MRIDs : 472916-01, -02 FOOD USES [X]
COMPANY NAME :Helena Chemical Company ACTION CODE: R300
PPC NUMBER OF THE TGAI IN THE PRODUCT 129099 DECISION NO.: 386647

FROM: Sami Malak, Chemist *Sami Malak*
Technical Review Branch/RD (7505P) *8/8m 01/22/08*

TO: 01 Venus Eagle/Kable Davis
Insecticide-Rodenticide Branch/RD (7505P)

INTRODUCTION:

In a letter dated 02/NOV/2007, the applicant requested a "mee-too" registration of subject product claiming its similarity to Senator 600 FS, Reg. no. 228-522. In support of the application, the applicant included product chemistry data, a proposed basic CSF dated 01/15/2008 (supersedeing 10/OCT/2007), a proposed label EPA received on 27/NOV/2007, Formulator's Exemption Statement, and Certificate With respect to Citation of Data.

FINDINGS:

1. The subject product was produced by a non-integrated formulation system, meaning that the active ingredient in the product is registered. The product contains [REDACTED] The product was formulated in the US.
2. The subject product, a fungicide, is intended for use as seed treatment of several crops.
3. The product is substantially similar in composition to Senator 600 FS, Reg. No. 228-522. Both products contain the same active ingredient at the same nominal concentration, upper/lower certified limits and physical/chemical properties. Exceptions: minor changes in the intentionally added inert ingredients.
- 4a. The applicant should be advised to submit the results of product's storage stability (GRN 830.6317) and corrosion characteristics (GRN 830.6320), when complete.
- 4b. Except for the data gap in Finding 4(a) above, the submitted product chemistry data is adequate and support registration of subject product.
5. Adequate analytical method is available for enforcement. The method was previously submitted and reviewed in connection with registration of the technical source, [REDACTED]

An analytical methods was included with this submission, MRID #472916-02, for the determination of the PAI of imidacloprid. The methods are reviewed in this memorandum.

6. The label claim nominal concentrations of 48.7% imidacloprid is consistent with that in the basic CSF dated 15/JAN/2008. Both are in compliance with the regulations of PR Notice 91-2. Further, the label storage and disposal statement and the physical or chemical hazards statement are in compliance with the regulations of 40CFR§156.78.
7. The proposed basic CSF dated 15/JAN/2008, was filled out correctly and completely and agree with the label claim nominal concentration. Further, the upper and lower certified limits are within the standard limits of 40CFR§158.175(b)(2). All ingredients claimed in the CSF have been approved for use in pesticide formulations intended for food uses.

CONCLUSIONS:

1. From the product chemistry view point, the subject product is substantially similar in composition to Senator 600 FS, Reg. No. 228-522 (Finding 3 above).
2. After resolving Findings 4(a) above, the TRB will have no objections for a "me-too" registration of subject product. The proposed basic CSF dated 01/15/2008 (supersedeing 10/OCT/2007) and label EPA received on 27/NOV/2007 are acceptable as per findings 6 & 7 above.

REVIEW OF PRODUCT CHEMISTRY DATA (MRID #471842-01 & -02)

1. A statement of data confidentiality dated 15/OCT/2007 was included with this submission claiming no confidentiality of any of the submitted data on the basis of its falling within the scope of FIFRA§10(d)(1)(A), (B), or (C).
2. A GLP statement dated 19/OCT/2007 was included with this submission to the effect that some of the submitted studies were conducted in compliance with the GLP requirements of 40CFR§160.

830-1800 Enforcement Analytical Method:

Adequate analytical method is available for enforcement. The method was previously submitted and reviewed in connection with registration of the technical source,

[REDACTED]

An analytical method was included with this submission, MRID #472916-02, for the determination of the PAI of imidacloprid. The method, a liquid chromatography (LC), is equipped with a UV detector using benzamide as an internal standard. In this method

Product ingredient source information may be entitled to confidential treatment

equal volumes of the test substance and the internal standard are mixed and 5 µl aliquots of the solution are injected into the LC. The retention time for benzamide was reported at 6.8 minutes and that of imidacloprid was 15.5 minutes. Method validation data regarding recovery, accuracy, precision, and linearity are adequate. Sample calculation was included with this submission.

Group A, Series 830-Product Identity, Composition, and Analysis (40 CFR 155, 160, 162, 167, 175 & 180)

830-1550 Product Identity and Composition

This product contains one registered technical source, plus intentionally added inert ingredients intended approved for use in pesticide formulations intended for food uses (refer to product's basic CSF dated 15/JAN/2008).

830-1600 Description of Materials Used to Produce the Product:
Refer to Confidential Appendix A.

830-1650 Description of Formulation Process:
Refer to Confidential appendix A.

830-1670 Discussion of Formation of Impurities:
Refer to Confidential appendix A.

830-1700 Preliminary Analysis:
Refer to Confidential appendix A.

830-1750 Certified Limits:
Refer to Confidential appendix A.

Identity, Composition, Formulation, and Analysis, Subgroup A, Series 830.1550 to 830.1800 (40 CFR 158.155 to 158.180)

Guideline Reference NO.(GRN 830.)/Title	Data Fulfilled	MRID No.
.1550 Product identity and composition	Y	472916-02
.1600 Description of materials used to produce the product	Y	472916-02
.1620 Description of production process	NA	
.1650 Description of formulation process	Y	472916-02
.1670 Discussion of formation of impurities	Y	472916-02
.1700 Preliminary analysis	NA	
.1750 Certified limits	Y	472916-02
.1800 Enforcement analytical method	Y	472916-02
Explanations: Y =The requirements were fulfilled; N = The requirements not fulfilled; N/A = Not applicable; G = Data gap; U = Requires upgrading; I = Incomplete or in progress; W = Waived.		

Physical and Chemical Properties of Subject Product, 40CFR158.190

Except for product's storage stability (GRN 830.6317) and corrosion characteristics (GRN 830.6320), the remaining physical/chemical properties included with this submission, MRID #472916-01 are acceptable.

Confidential Appendix A

Pages 17-18 *Manufacturing process information may be entitled to confidential treatment*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 29, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

HELENA CHEMICAL CO
225 SCHILLING BOULEVARD, SUITE 300
COLLIERVILLE, TN 38017

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 27-NOV-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

NEW APPLICATIONS

DATE: NOV 27 2007

FILE NUMBER: 5905- LTT

FEP (OPPIN ENTRY) LV 11/28/07
(Initial & date)

FILE ROOM: _____
(Initial & date)

SIG: KC 11/29/07
(Initial & date)

FILE ROOM: AC 11/30/07
(Initial & date)

✓ ASSIGN TO PM / (NO DATA)

 JACKET TO SHELF (DATA)

PRIA fee has been pre-paid.

Copy of check/pay.gov
receipt enclosed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

November 28, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-386647
EPA File Symbol or Registration Number: 5905-LTT
Product Name: HELECLOPRID SEED TREATMENT
EPA Receipt Date: 27-Nov-2007
EPA Company Number: 5905
Company Name: HELENA CHEMICAL CO

SCOTT A. PACE
HELENA CHEMICAL CO
225 SCHILLING BOULEVARD, SUITE 300
COLLIERVILLE, TN 38017

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of
reen will be
communicated separately. During the administrative screen, the Office of Pesticide Programs
has determined that this Action is subject to a Pesticide Registration Service Fee as defined in
the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R300

NEW PRODUCT;ME-TOO PRODUCT FAST TRACK;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman at (703) 305-6249.

Sincerely,

A handwritten signature in cursive script that reads "Teresa Downs".

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

8205399~

This package includes the following

- New Registration
Amendment

✓ Studies? Fee Waiver?
volpay % Reduction: ____

for Division

- AD
BPPD
• RD

Risk Mgr. 1

Receipt No. S- 820539

EPA File Symbol/Reg. No. 5905-LTT

Pin-Punch Date: 11/27/2007

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R300

Granted: R300

Amount Due: \$ 1300

Parent/Child Decisions:

X Inert Cleared for Intended Use

Uncleared Inert in Product

Reviewer: JPH

Date: 11/28/07

Remarks: Inerts are cleared under 40 CFR 180.920 (application to growing crops only). A-Debesai 11/28/07

Receipt for Section 3

S: 820539

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee for Service: ☒ Yes ☐ No

Application Type: New Registration

Billable: ☒ Yes ☐ No

Company: 5905 HELENA CHEMICAL CO

V

Risk Manager: Registration Division, Risk Management Team 1

Product #: 5905-LTT

Product Name: HELECLOPRID SEED TREATMENT

Commercial:

Me Too Section 3: 228-522

Me Too Product Name: SENATOR 600 FS

Application Date: 02-Nov-2007

ie

OPP Rec'd Date: 27-Nov-2007

ie

Front End Date: 26-Nov-2007

ie

Risk Manager Send Date:

ie

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New FFS Request: ☐

Receipt Description:

Submission for me-too Registration

New Ingredient

Request Date:

New Ingredient

Request Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Study

FEE FOR SERVICE

N. J. CHEMICAL COMPANY
SCHILLING BLVD., SUITE 300, COLLIERVILLE, TN 37037 7

No. 1565526

TE: 20-NOV-07

VENDOR NAME

US EPA WASHINGTON FI VENDOR NO. 72862

[illegible]

PLEASE DETACH AND RETAIN THIS STATEMENT AS YOUR RECORD OF PAYMENT.

Thank You

0.00

1,300.00



HELENA CHEMICAL COMPANY

225 SCHILLING BLVD., SUITE 300
COLLIERVILLE, TN 38017

MELLON BANK, N.A.
Pittsburgh, PA

No. 1565526

60-160
433

CHECK DATE	CHECK NUMBER	CHECK AMOUNT
20-NOV-07	1565526	*****1,300.00

PAY	One Thousand Three Hundred Dollars And 00 Cents*****	ACCOUNTS PAYABLE
-----	--	------------------

TO
THE
ORDER
OF

US EPA WASHINGTON FINANCE CENTER
US BANK - GVMT LOCKBOX 979074
1005 CONVENTION PLAZA
SL-MO-C2-GL
ST LOUIS, MO 63197

BY Troy Trost

NOT VALID AFTER 180 DAYS

11000156552611



Application for Pesticide - Section I

1. Company/Product Number 5905- LTT	2. EPA Product Manager VENUS EAGLE	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HELECLOPRID SEED TREATMENT	PM#	
5. Name and Address of Applicant (Include ZIP Code) Helena Chemical Company 225 Schilling Boulevard, Suite 300 Collierville, Tennessee 38017 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>228-522</u> Product Name <u>SENATOR 600 FS</u>	

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Submission for "Me-Too" Registration

1. Material This Product Will Be Packaged In:						2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt No. per container			
3. Location of Net Contents Information			4. Size(s) Retail Container		5. Location of Label Directions		
<input checked="" type="checkbox"/> Label <input type="checkbox"/> Container			1, 2x2.5, 4x1, 30, 55, & Bulk		<input checked="" type="checkbox"/> On Label		
6. Manner in Which Label is Affixed to Product			<input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled				
Self Adhesive			<input type="checkbox"/> Other _____				

27



HELENA CHEMICAL COMPANY

225 Schilling Blvd., Suite 300
Collierville, Tennessee 38017
Telephone: 901/761-0050

November 2, 2007

U. S. Environmental Protection Agency
Document Processing Desk (APPL)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive Room S-4900
Arlington, VA 22202

RE: Helecloprid Seed Treatment
Application for New Pesticide Registration
Venus Eagle : Insecticide Branch


Dear Ms. Eagle :

This letter is designed to transmit to you Helena Chemical Company's Application for Registration of a Pesticide, for its product Helecloprid Seed Treatment. This product submission is a "me-too" registration PRIA classification R30 and as such should qualify for "Fast Track" review. In support of this action, enclosed please find the following:

1. EPA Form 8570-1 Application for Registration
2. EPA Form 8570-4 Confidential Statement of Formula
3. EPA Form 8570-27 Formulator's Exemption Statement w/
attached list of Production Sites for Helena Chemical Company
4. EPA Form 8570-34 Certification with Respect to Citation of Data
5. EPA Form 8570-35 Data Matrix
6. EPA Form 8570-36 Summary of the Physical/Chemical Properties
7. EPA Form 8570-37 Self-Certification Statement for the Physical/Chemical
Properties
8. Three (3) Paper Copies of Relevant Product Chemistry Studies for End Use Product
9. Five (5) Copies of Draft Labeling

I trust that you will find this application complete and in compliance with the requirements for registration under FIFRA. If there are any questions about this submission, please contact me at 901-752-4410. Thank you for your attention to and assistance with this matter.

Sincerely,



Scott A. Pace
Manager: Registration Department
Helena Chemical Company

cc: Pro-Mate Ronstar 1.5% Plus Fertilizer
S:\Depart\Registration\Reg. Info\EPA Pesticides\forms and reports



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

Helena Chemical Company
225 Schilling Boulevard, Suite 300
Collierville, TN 38017

EPA File Symbol/Registration Number

5905-

Product Name

HELECLOPRID SEED TREATMENT

Date of Confidential Statement of Formula (EPA Form 8570-4)

10/10/2007

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

Imidacloprid

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

- (3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient

Product Name

Registration Number

Imidacloprid

+

Product ingredient source information may be entitled to confidential treatment

Signature

Name and Title

Date

Scott A. Pace : Manager : Registration Department

11/02/07



HELENA CHEMICAL COMPANY
225 Schilling Blvd., Suite 300
Collierville, Tennessee 38017
Telephone: 901-761-0050

Helena Chemical Company Production Facilities

Manufacturing/Production Plants

Helena Chemical Company
Highway 49 Bypass
West Helena, Arkansas 72390

EPA Est. No. 5905-AR-001

Helena Chemical Company
434 Fenn Road
Cordele, Georgia 31015

EPA Est. No. 5905-GA-001

Helena Chemical Company
1075 S. Vineland
Kerman, California 93630

EPA Est. No. 5905-CA-001

Helena Chemical Company
3523 Vandalia
Des Moines, Iowa 50317

EPA Est. No. 5905-IA-001

Helena Chemical Company
13966 US 301 South
Rowland, NC 28383

EPA Est. No. 5905-NC-018

Helena Chemical Company
3630 Selvitz Road
Ft. Pierce, Fla. 34982

EPA Est. No. 5905-FL-03

Update 10-15-06



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Helena Chemical Company, 225 Schilling Blvd. Suite 300, Collierville, TN 38017 (901) 752-4420	EPA Registration Number/File Symbol 5905-
Active Ingredient(s) and/or representative test compound(s)	Date 11/02/07
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Agricultural	Product Name HELECLOPRID SEED TREATMENT

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

Typed or Printed Name and Title

11/02/2007

Scott A. Pace



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 11/02/2007	EPA Reg No./File Symbol 5905-	Page 1 of 12
Applicant's/Registrant's Name & Address Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017	Product Helecloprid Seed Treatment	

Ingredient IMIDACLOPRID

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		Product Data Submitters List	PDSI	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		Product Data Submitters List	PDSI	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		Product Data Submitters List	PDSI	
870.2400	Primary Eye Irritation Study in Rats		Product Data Submitters List	PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		Product Data Submitters List	PDSI	
870.2500	Primary Skin Irritation Study in Rabbits		Product Data Submitters List	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		Helena Chemical Company-5905	OWN	
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For		Helena Chemical Company-5905		
830.1800 (1996)	End-Use Product				
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		Helena Chemical Company-5905	OWN	
	to the OPPTS Test Guidelines, Series 830, as Established		Helena Chemical Company-5905	OWN	
	in 40 CFR, Part 158.190, and formatted in compliance		Helena Chemical Company-5905	OWN	
	with PR Notice(s) 86-5 and 98-1.		Helena Chemical Company-5905	OWN	

Signature

Name and Title

Scott A. Pace:Product Registration Dept.

Date

11/02/2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 11/02/2007

EPA Reg No./File Symbol 5905-

Page 2 of 12

Applicant's/Registrant's Name & Address

Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017

Product

Helecloprid Seed Treatment

Ingredient IMIDACLOPRID

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		SYNGENTA CROP PROTECTION, INC	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		PO BOX 18300	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		GREENSBORO NC 27419	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		NUFARM AMERICAS INC	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		150 HARVESTER DRIVE, SUITE 200	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		BURR RIDGE IL 60527		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1995)	End-Use Product		BAVER CROPS SCIENCE LP		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		T W ALEXANDER DRIVE		
	to the OPPTS Test Guidelines, Series 830, as Established		RESEARCH TRIANGLE PARK NC 27709		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		FMC CORP. AGRICULTURAL PRODUCTS GROUP		
			1735 MARKET ST		
			PHILADELPHIA PA 19103		

Signature

Name and Title

Scott A. Pace:Product Registration Dept.

Date

11/02/2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 11/02/2007	EPA Reg No./File Symbol 5905-	Page 3 of 13
Applicant's/Registrant's Name & Address Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017	Product Helecloprid Seed Treatment	

Ingredient IMIDACLOPRID

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1997)	Acute Dermal Toxicity in Rats-Limit Test		BAYER ENVIRONMENTAL SCIENCE	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		2 T. W. ALEXANDER DRIVE	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		RESEARCH TRIANGLE PARK NC 27709	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		PBI/GORDON CORP	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		1217 WEST 12TH STREET	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		KANSAS CITY MO 64101		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		BAYER CORP		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		8400 HAWTHORN RD		
	to the OPPTS Test Guidelines, Series 830, as Established		KANSAS CITY MO 64120		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		GUSTAFSON LLC		
			PO BOX 660065		
			DAI I AS TX 75266		

Signature

Name and Title

Date

Scott A. Pace:Product Registration Dept.

11/02/2007

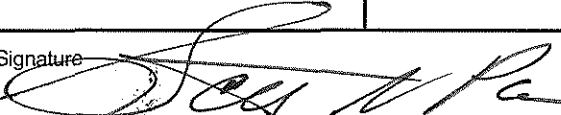


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date 11/02/2007			EPA Reg No./File Symbol 5905-		Page 4 of 12
Applicant's/Registrant's Name & Address Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017			Product Helecloprid Seed Treatment		
Ingredient IMIDACLOPRID					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		THE ANDERSONS LAWN FERTILIZER DIVISION	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		PO BOX 119	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		MAUMEE OH 43537	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		CHEMICAL SPECIALTIES INC	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		ONE WOODLAWN GREEN 350	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		CHARLOTTE NC 28217		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		DAVER HEALTHCARE LLC		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		PO BOX 300		
	to the OPPTS Test Guidelines, Series 830, as Established		SHAWNEE MISSION KS 66201		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		MITSUI CHEMICALS, INC		
			SHIODOME CITY CTR, 1-5-2 HIGASHI-SHIMIZU		
			MINATO-KU TOKYO 105-7117		
Signature 			Name and Title Scott A. Pace:Product Registration Dept.		Date 11/02/2007



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Date 11/02/2007

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Applicant's/Registrant's Name & Address

Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017

Product

Heleclopid Seed Treatment

Ingredient IMIDACLOPRID

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		LOVELAND PRODUCTS, INC	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		PO BOX 1286	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		GREELEY CO 80632	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		LANXESS CORPORATION	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		111 RIDC PARK WEST DRIVE	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		PITTSBURGH PA 15275		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		ALBAUGH INC		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		1525 NE 36TH STREET		
	to the OPPTS Test Guidelines, Series 830, as Established		ANKENY IA 50021		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		AEROXON INC		
			2125 CENTER AVE SUITE 500		
			FORT LEE NJ 07024		

Signature

Name and Title

Scott A. Pace:Product Registration Dept.

Date

11/02/2007




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DATA MATRIX

Date 11/02/2007			EPA Reg No./File Symbol 5905-		Page 10 of 12
Applicant's/Registrant's Name & Address Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017			Product Helecloprid Seed Treatment		
Ingredient IMIDACLOPRID					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		ARBORJET	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		99 BLUEBERRY HILL ROAD	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		WOBURN MA 01801	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		RESIDENTIAL EXPOSURE JOINT VENTURE (R)	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		900 17TH STREET, NW, SUITE 300	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		WASHINGTON DC 20006		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		AGRICULTURAL HANDLERS EXPOSURE T		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		PO BOX 500		
	to the OPPTS Test Guidelines, Series 830, as Established		MACON MO 63552		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		ARCH TREATMENT TECHNOLOGIES, INC		
			1055 LAKE PARK DRIVE		
			SMYRNA GA 30080		
Signature 			Name and Title Scott A. Pace:Product Registration Dept.		Date 11/02/2007



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Date 11/02/2007	EPA Reg No./File Symbol 5905-	Page 6 of 13
Applicant's/Registrant's Name & Address Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017	Product Helecloprid Seed Treatment	

Ingredient IMIDACLOPRID

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1984)	Acute Dermal Toxicity in Rats-Limit Test		CONTROL SOLUTIONS, INC	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		5903 GENOA-RED BLUFF	PDSL	
870.1300 (1993)	Acute Inhalation Toxicity Study in Rats-Limit Test		PASADENA TX 77507	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		MAKHTESHIM-AGAN OF NORTH AMERICA INC	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		4515 FALLS OF NEUSE RD, SUITE 300	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		RALEIGH NC 27609		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		SPRAY DRIET TASK FORCE		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		MCKENNA LONG & ALDRIDGE II		
	to the OPPTS Test Guidelines, Series 830, as Established		1900 K STREET, NW		
	in 40 CFR, Part 158.190, and formatted in compliance		WASHINGTON DC 20006		
	with PR Notice(s) 86-5 and 98-1.				

Signature

Name and Title

Scott A. Pace:Product Registration Dept.

Date

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Applicant's/Registrant's Name & Address Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017			Product Helecloprid Seed Treatment		
Ingredient ACLOPRID					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1938)	Acute Dermal Toxicity in Rats-Limit Test		MYCOGEN SEEDS	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		9330 ZIONSVILLE ROAD	PDSL	
870.1300 (1993)	Acute Inhalation Toxicity Study in Rats-Limit Test		INDIANAPOLIS IN 46268	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		ARBOR SYSTEMS, LLC	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		10168 L STREET	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		OMAHA NE 68134		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		UNITED PHOSPHORUS INC.		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		630 FREEDOM BUSINESS CENTER, SUITE 401		
	to the OPPTS Test Guidelines, Series 830, as Established		KING OF PRUSSIA PA 19406		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		NUFARM, INC		
			150 HARVESTER DRIVE SUITE 200		
			RIER RIDGE IL 60527		
Signature 			Name and Title Scott A. Pace:Product Registration Dept.		Date 11/02/2007



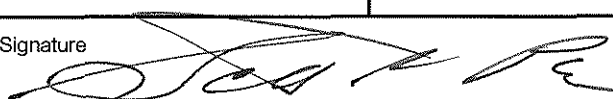
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Date 11/02/2007			EPA Reg No./File Symbol 5905-		Page 8 of 12
Applicant's/Registrant's Name & Address Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017			Product Helecloprid Seed Treatment		
Ingredient IMIDACLOPRID					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		1350 I STREET, N.W	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		WASHINGTON DC 20005	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		AGRICULTURAL REENTRY TASK FORCE	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		1350 I STREET, N.W.	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		WASHINGTON DC 20005		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		RAVER ADVANCED		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		2 TW ALEXANDER DRIVE		
	to the OPPTS Test Guidelines, Series 830, as Established		RESEARCH TRIANGLE PARK NC 27709		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		SCIMETRICS, LTD. CORP		
			120 COMMERCE DRIVE SUITE 1		
			FT COLLINS CO 80521		
Signature 			Name and Title Scott A. Pace:Product Registration Dept.		Date 11/02/2007

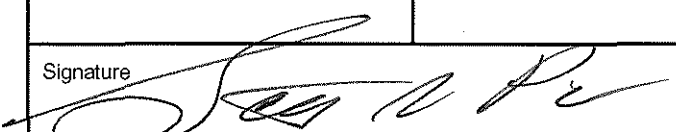


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Date 11/02/2007			EPA Reg No./File Symbol 5905-		Page 9 of 13
Applicant's/Registrant's Name & Address Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017			Product Helecloprid Seed Treatment		
Ingredient IMIDACLOPRID					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		ZELAM LTD	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		HUDSON ROAD	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		NEW PLYMOUTH	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		SAPSTAIN INDUSTRY GROUP (SIG) - (CONSON)	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		1125 TRENTON-HARBOURTON R	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		TITUSVILLE NJ 09560		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		INNOVATIVE PEST CONTROL PRODUCTS		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		PO BOX 880216		
	to the OPPTS Test Guidelines, Series 830, as Established		BOCA RATON FL 33488		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		FIFRA ENDANGERED SPECIES TASK FORCE		
			C/O HAROLD HIMMELMAN (BEVERIDGE & D)		
			1350 I STREET NW		
Signature 			Name and Title Scott A. Pace:Product Registration Dept.		Date 11/02/2007



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Applicant's/Registrant's Name & Address Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017	Product Heleclopid Seed Treatment	

Ingredient IMIDACLOPRID

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		GRO-PRO, LLC	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		501 CASCADE POINTE LANE, SUITE 103	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		CARY NC 27513	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		ROTAM LTD	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		18 CHEUNG LEE STREET	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		CHAI WAN, HONG KONG		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		ETIGRA LLC		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		25 GREYSTONE		
	to the OPPTS Test Guidelines, Series 830, as Established		LEWES DE 19958		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		ENSYSTEX III, INC		
			2700 BREEZEWOOD AVENUE		
			FAVETTEVILLE NC 28303		

Signature

Name and Title

Scott A. Pace:Product Registration Dept.

Date

11/02/2007

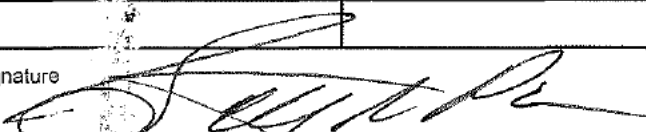


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DATA MATRIX

Date 11/02/2007			EPA Reg No./File Symbol 5905-		Page 12 of 13
Applicant's/Registrant's Name & Address Helena Chem Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017			Product Helecloprid Seed Treatment		
Ingredient IMIDACLOPRID					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		ROTAM AGROCHEMICAL COMPANY LIMITED	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		7/F CHEUNG TAT CENTER, NO 18 CHEUNG LEE	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		CHAI WAN, HONG KONG	PDSL	
870.2400	Primary Eye Irritation Study in Rats			PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method		SHARDA USA LLC	PDSL	
870.2500	Primary Skin Irritation Study in Rabbits		PO BOX 640	PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,		HOCKESSIN DE 19707		
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product		ENISYSTEM IV, INC.		
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According		2700 BREEZEWOOD AVENUE		
	to the OPPTS Test Guidelines, Series 830, as Established		FAYETTEVILLE NC 28303		
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.		DALIAN CHEMPHY CHEMICALS CO., LTD		
			1150 18TH STREET NW SUITE 1000		
			WASHINGTON DC 20036		
Signature 			Name and Title Scott A. Pace:Product Registration Dept.		Date 11/02/2007



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DATA MATRIX

Date 11/02/2007

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Applicant's/Registrant's Name & Address

Helena Chemical Company, 225 Schilling Blvd., Suite 300, Collierville, TN 38017

Product

Helecloprid Seed Treatment

Ingredient IMIDACLOPRID

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1200 (1998)	Acute Dermal Toxicity in Rats-Limit Test		INTERREGIONAL RESEARCH PROJECT NO. 4	PDSL	
870.1100 (2002)	Acute Oral Toxicity Up & Down Procedure in Rats		RUTGERS UNIVERSITY	PDSL	
870.1300 (1998)	Acute Inhalation Toxicity Study in Rats-Limit Test		500 COLLEGE ROAD EAST, SUITE 201 W	PDSL	
870.2400	Primary Eye Irritation Study in Rats		PRINCETON NJ 08903	PDSL	
870.2600 (2003)	Dermal Sensitization Study in Guinea Pigs Buehler Method			PDSL	
870.2500	Primary Skin Irritation Study in Rabbits			PDSL	
830.1550; 830.1600; 830.1620;	Product Analysis Data According to OPPTS Guidelines,				
830.1670; 830.1700; 830.1750	Series 830, As Established in 40 CFR, Part 158, For				
830.1800 (1996)	End-Use Product				
830.6302 to 830.7300 (1996)	Summary of Physical/Chemical Properties According				
	to the OPPTS Test Guidelines, Series 830, as Established				
	in 40 CFR, Part 158.190, and formatted in compliance				
	with PR Notice(s) 86-5 and 98-1.				

Signature

Name and Title

Scott A. Pace:Product Registration Dept.

Date

11/02/2007



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SUMMARY OF THE PHYSICAL/CHEMICAL PROPERTIES (PR Notice 98-1)

1. PRODUCT NAME: Helicopirid Seed Treatment		2. Reg. No. 5905-
3. COMPANY NAME: Helena Chemical Company		4. SUBMISSION DATE: 11/02/07
5. FIRST SUBMISSION <input checked="" type="checkbox"/>	7. PESTICIDE TYPE:	10. REGISTRATION <input checked="" type="checkbox"/>
6. RESUBMISSION <input type="checkbox"/>		
8. FORMULATED MANUFACTURING-USE PRODUCT <input type="checkbox"/> or 9. END-USE PRODUCT <input checked="" type="checkbox"/>		11. REREGISTRATION <input type="checkbox"/>
13. PRODUCT MANAGER OR CHEMICAL REVIEW MANAGER #/NAME (IF KNOWN): V. Eagle		12. REREG CASE #
14. GUIDELINE REFERENCE NO.(GRN)/TITLE	15. VALUE or QUALITATIVE DESCRIPTION/METHOD(S) USED WHERE APPLICABLE AND REFERENCES	16. MRID or REPORT NO. Product Safety Lab Report # 19676

Group B, Series 830-Physical and Chemical Properties (40 CFR 158.190)

-6302	Color	White	PSL Study # 21864
-6303	Physical State	Liquid	PSL Study # 21864
-6304	Odor	Faint Odor	PSL Study # 21864
-6314	Oxidation/Reduction: Chemical Incompatibility	Compatible / (Incompatible with 10% Potassium Permanganate	PSL Study # 21864
-6315	Flammability/Flame Extension	>100 degrees centigrade	PSL Study # 21864
-6316	Explodability	NR	
-6317	Storage Stability	In Progress	Product Safety Labs
-6319	Miscibility	NR	
-6320	Corrosion Characteristics	On going	Product Safety Labs
-6321	Dielectric Breakdown Voltage	NR	
-7000	pH	4.67 +/- 0.2	PSL Study # 21864
7100	Viscosity (Centistokes)	136.937 (20 degrees C) 81.857 (40 degrees C)	PSL Study # 21864
-7300	Density/Relative Density/ Bulk Density	1.123 g/ml	PSL Study # 21864



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401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

**SELF-CERTIFICATION STATEMENT FOR THE
PHYSICAL/CHEMICAL PROPERTIES (PR NOTICE 98-1)****Product Name:** Helecloprid Seed Treatment**Reg. No./File Symbol No.** 5905-
(if known) or **Company No.****SELF-CERTIFICATION STATEMENT:**

I certify that the reported information on the "Summary Form" represents a true and accurate record of the test results of studies generated or owned by (Company Name): Helena Chemical Company and that the values of the properties reported are reliable.

I further certify that such data was generated in substantial conformity with OPPTS Test Guidelines Series 830 Product Properties, applicable to my product, and in effect at the time of submission.

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of section 12(a)(2)(N) of FIFRA without opportunity for hearing, if I have not submitted to EPA within thirty (30) days of receipt of a request by the Agency, or within a specified time agreed to by the Agency, test results of studies summarized in the "Summary Form."

As a condition of registration, EPA may, by order, (1) withdraw a pending registration, (2) suspend the registration of this product without opportunity for hearing, or (3) assess civil penalties provided for in section 14 of FIFRA for violations of sections 12(a)(2)(N), 12(a)(2)(Q), or 12(a)(2)(R) of FIFRA without opportunity for hearing, if I fail to provide to EPA within thirty (30) days of receipt of a notification of error, or within a specified time agreed to by the Agency, information that EPA determines is required to correct the error.

Type Applicant's Name:

Scott A. Pace

Title:

Manager: Product Registration Department

Telephone No.

(901) 752-4410

Applicant's Signature:**Date:**

11/02/2007

EPA Form 8570-37 (07/JAN/1998)

Attach-2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MAR 07 2012

Scott Pace
Helena Chemical Company
225 Schilling Blvd., Suite 300
Collierville, TN 38017

Dear Mr. Pace:

Subject: Submission of storage stability and corrosion characteristics data
Helacloprid Seed Treatment
EPA Registration No. 5905-577
Your submission dated May 20, 2009

The conditional data referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is **acceptable**. A copy of the review is enclosed. Should you have any questions, please contact me at 703-305-5314 or metzger.autumn@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Autumn Metzger", written over a circular stamp or seal.

Autumn Metzger
Insecticide-Rodenticide Branch
Registration Division (7505P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

DATE OUT: January 20, 2012

SUBJECT: Storage Stability (830.6317)) & Corrosion Characteristics (830.6320) Review

STUDY Accelerated ☐ ONE YEAR ☒ >1 YEAR ☐

Manufacturing use product: ☐

End use product: ☒

Experimental use product: ☐

ACTION CODE 570

DP BARCODE No.: 366062

REG. No.: 5905-577

DECISION No.: 404330

MRID No(s): 47757101

PC Code: 129099

PRODUCT NAME: HELACLOPRID SEED TREATMENT

COMPANY: Helena Chemical Co.

FROM Roger Chesser, Reviewer
Inert Ingredients Assessment Branch/RD (7505P)

TO: Venus Eagle/Autumn Metzger, RM 01
Insecticide Rodenticide Branch / RD (7505P)

STB 01/24/12

Roger Chesser 1-25-2012

I CONCLUSIONS

STORAGE STABILITY (830.6317):

☒ ACCEPTABLE

☐ UNACCEPTABLE*

☐ UPGRADEABLE*

40CFR §158.310 DATA REQUIREMENT ☐ SATISFIED ☐ NOT SATISFIED

CORROSION CHARACTERISTICS (830.6320):

☒ ACCEPTABLE

☐ UNACCEPTABLE*

☐ UPGRADEABLE*

* If unacceptable or upgradeable describe the deficiency and provide recommendations

Comments & Recommendations:

II STUDY SUMMARY

A. STUDY CONDUCTED UNDER US GLP/OECD GUIDELINES

- ☐ Yes
☐ No

B. PRODUCT INFORMATION

Active ingredient(s): IMIDACLOPRID 48.7%

Label claims Nominal concentration (%):

IMIDACLOPRID	48.7%
--------------	-------

Initial concentration of the AI (%) used in the study

IMIDACLOPRID	50.1%
--------------	-------

Final concentration of AI (%) after one year storage:

IMIDACLOPRID	50.2%
--------------	-------

C. EXPERIMENTAL PARAMETERS

Temperature: Ambient ☒ Freezer ☐ Room ☐ Warehouse ☐ Other ☐ 18 - 24° C

Duration of study: ☒ 1 year; ☐ over 1 year

Type of container: ☐ Glass; ☐ Metal; ☒ HDPE; ☐ Fluorinated HDPE; ☐ Plastic

High density polyethylene containers

Analysis at intervals: ☒ 0 (initial);

☒ 3 months; ☒ 6 months

☒ 9 months; ☒ 12 months ☐ Over 12 months

D. ANALYTICAL METHOD

Method	DETECTOR
High Performance Liquid Chromatography (HPLC)	<input type="checkbox"/> FID (Flame Ionization Detector)
	<input type="checkbox"/> ECD (Electron Capture Detector)
	<input type="checkbox"/> N/P (Nitrogen/Phosphorous Detector)
	<input checked="" type="checkbox"/> Other UV

E. RESULTS

Compared to the initial concentration of 50.2% wt/wt of IMIDACLOPRID, the reported data shows that on the 3rd, 6th, 9th, and 12th month time periods the AI% remained well within the statutory parameters required in Title 40 CFR § 158.350 while stored at ambient temperatures. The mean percent total weight change observed in the test containers was -0.04%

The analytical methods were evaluated for precision, linearity, spiked recovery and standard accuracy.

The containers selected for storage were high density polyethylene. The containers simulated the commercial packaging of the product. The product showed no signs of phase separation or discoloration throughout the study period. During the storage period, the container showed no signs of cracking, fogging, discoloration, or deformation. No corrosion characteristics were observed for any samples at each sampling interval.



HELENA CHEMICAL COMPANY

225 Schilling Blvd., Suite 300
Collierville, Tennessee 38017
Telephone: 901-761-0050

477571-00

May 20, 2009
U.S. Environmental Protection Agency
Document Processing Desk
Office of Pesticide Programs 7504C
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive Room S-4900
Arlington, VA 22202-4501

RE: Helacloprid Seed Treatment
EPA File Symbol: 5905-577:
Att: Ms. Jane Kuhn

47757101

Enclosed, you will find Helena Chemical Company's signed OPPTS Guideline 830.6317 Storage Stability and Corrosion Characteristics study. #21863. It seems this is missing from where I sent in back in December. Per my conversation with Autumn Metzger it was easier just to resend. Please place in our product jacket #5905-577.

Three (3) copies of the Storage Stability and Corrosion Characteristics Study

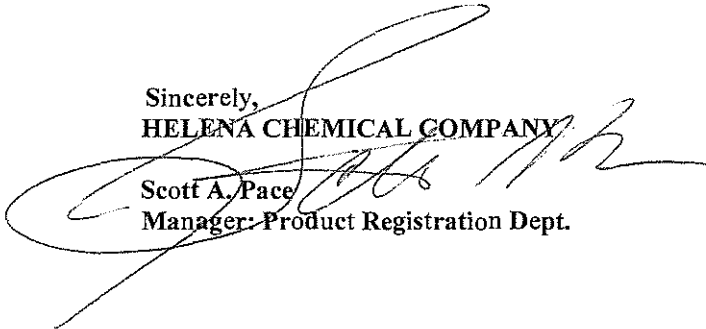
If there are any questions about this submission, please contact me at (901) 752-4410. Thank you for your assistance in this matter.

Sincerely,

Scott A. Pace
Manager: Registration
Helena Chemical Company

cc: S:\departments\Registration\Registration Information\EPA Correspondence\Helacloprid/

/Enclosures

Sincerely,
HELENA CHEMICAL COMPANY

Scott A. Pace
Manager: Product Registration Dept.

/Enclosures

Material to be added to an e-Jacket/Jacket

Reg. No. 5905-577

Description: _____

1. ☐ Placement within the e-Jacket/jacket:
- ☐ Default: (chronological, top = newest)
 - ☐ File Location: (PDF page number, i.e., "before page 45")
- _____
- _____

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☒ Notification
- ☐ New CSF
- ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: San. Sonil

Phone: 703 305-5408 Division: Rad

Date: 09/17/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 17 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Cheryl Wagner
Helena Chemical Company
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Subject: Revised Storage and Disposal Label Language

Dear Ms. Wagner:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated August 26, 2010 for:

EPA Registration 5905-577

Helacloprid Seed Treatment

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be "Dani Daniel".

Dani Daniel
Registration Division (7504P)
Insecticide/Rodenticide Branch



United States
Environmental Protection Agency
Washington, DC 20460
NOTIFICATION
SEP 17 2010

X

Registration

OPP Identifier Number

Amendment

Other

Application for Pesticide - Section I

1. Company/Product Number 5905-577	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Helacloprid Seed Treatment	PM# 1	
5. Name and Address of Applicant (Include Zip Code) Helena Chemical Company c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
--	---

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the provisions of PR Notice 2007-4 and EPA Regulations at 40 CFR 156.10, 154.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the requirements 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under Sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags	
* Certification must be submitted		If "Yes" No. per Unit Packaging wgt. container	If "Yes" No. per Package wgt container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gal., 5 gal., 30 gal., 55 gal. 250 gal.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ adhesive backed label <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Cheryl Wagner	Title Agent for Helena Chemical Company	Telephone No. (Include Area Code) (302) 234 8551	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received <div style="border: 1px solid black; padding: 5px; text-align: center;"> (Stamped) </div>
2. Signature 	3. Title Agent for Helena Chemical Company		
4. Typed Name Cheryl Wagner	5. Date August 26, 2010		



Document Processing Desk (NOTIF)
ATTN: Ms. Venus Eagle, PM 1
Registration Division (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

Dear Ms. Eagle:

Re: Helacloprid Seed Treatment
EPA Registration Number 5905-577
Notice of Revised Storage & Disposal Label Language

Wagner Regulatory Associates, Inc., on behalf of Helena Chemical Company, hereby notifies the Agency that the storage and disposal section of the subject label as been revised in accordance with PR Notice 2007-4. Enclosed for the Agency's file is:

- Letter from Helena Chemical Company authorizing Wagner Regulatory to serve as Agent
- EPA Notification form (EPA Form 8570-1)
- One copy of revised labeling

Please feel free to contact me at (302) 234-8551 if you have any questions or require additional information.

Respectfully submitted,

Cliff Wagner

Cheryl Wagner
Agent for Helena Chemical Company

[illegible]

NOTIFICATION

SEP 17 2010

Helecloprid Seed Treatment

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....48.7%

INERT INGREDIENTS:51.3%

Total100.0%

Contains 5 pounds of active ingredient per gallon (600 grams per liter) @ 20°C

EPA Reg. No. 5905-577

EPA Est. No

KEEP OUT OF REACH OF CHILDREN

CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail).

See inside for additional precautionary statements. Read the entire label before using this product. Use only according to label instructions.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if inhaled. Harmful if swallowed. Avoid breathing spray mist.

Remove contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contact with eyes or clothing. Wear protective eyewear, long-sleeved shirt and long pants, socks, shoes, and chemical-resistant gloves made of waterproof material such as polyethylene, polyvinylchloride (PVC) or viton.

Personal Protective Equipment (PPE):

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category C on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such as, nitrile rubber, butyl rubber, neoprene rubber, barrier laminate, polyethylene, polyvinyl chloride (PVC) or viton.
- Shoes plus socks
- Protective eyewear

Follow manufacturer's instructions for cleaning/maintaining personal protective equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

IF INHALED:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
IF SWALLOWED:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF IN EYES:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
Have a product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact ChemTrec at 1-800-424-9300, collect day or night, for emergency treatment information.	

ENVIRONMENTAL HAZARDS

This product is highly toxic to birds and aquatic invertebrates. For terrestrial uses, do not apply directly to water, areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Cover or incorporate spilled treated seeds.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For use in commercial seed treaters only, with the exception of application to canola, cotton (delinted seed), field corn, sorghum, wheat and barley, which may be made either by commercial seed treatment or as an end-use seed treatment on agricultural establishments at, or immediately before, planting. This product is to be used in liquid or slurry treaters.

Do not apply this product in a way that will contact workers or other persons, either

directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

Exception: If the seed is treated with the product and the treated seed is soil injected or soil incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated. PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material such as, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC), or Viton
- Shoes plus socks
- Protective eyewear

ROTATIONAL CROPS*

Treated areas may be replanted with any crop specified on an imidacloprid label, or any crop for which a tolerance exists for the active ingredient, as soon as practical following the last application. The following plant-back interval should be observed for listed crops:

IMMEDIATE PLANT-BACK:

Artichoke, Barley, Brassica (cole) leafy vegetables, Canola, Cilantro, Corn, Field, Corn, Sweet, Cotton, Cranberry, Cucurbits, Eggplant, Ground cherry, Leaf petiole vegetables, Leafy vegetables, Legume vegetables (succulent or dried, except soybean), Mustard seed, Oats, Okra, Pepinos, Pepper, Popcorn, Potato, Rapeseed, Rye, Sorghum, Soybean, Strawberry, Sugarbeet, Tomatilo, Tomato, Triticale, Veg. Root and Tuber, Watercress, Wheat

30-DAY PLANT-BACK:

Cereals (including buckwheat, millet, oats, rice, safflower)

All Other Crops

*Cover crops for soil building or erosion control may be planted any time, but do not graze or harvest for food or feed.

*For all other crops not listed on an imidacloprid label, or for crops for which no tolerance for the active ingredient has been established, a 12-month plant-back interval should be observed.

NOTIFICATION of the crop rotational restriction must be conveyed to the grower by appropriate seed tag labeling or bag printing on all seed units.

NOTE: The purchaser of this product is responsible for ensuring that all seed treated with this product are adequately dyed with a suitable color to prevent its accidental use as food for man or feed for animals. Refer to 21 CFR, Part 2.25. Any dye or colorant added to treated seed must be cleared for use under 40 CFR, Par 180.1001. Federal regulations have established official tolerances for certain pesticide residues. In order that residues on food and forage crops will not exceed established tolerances, use only at recommended rates.

Treated seed must not be used for or mixed with food or animal feed or processed for oil. Seed commercially treated with this product must be labeled in accordance with all applicable requirements of the Federal Seed Act.

Labels for commercially treated seed should include the following addition to the Environmental Hazards statements:

Exposed treated seed may be hazardous to birds. Dispose of all excess treated seed and seed packaging by burial away from bodies of water. Cover or incorporate spilled treated seeds.

Rape seeds grown and harvested from this product's treated seed must not be used for human and feed consumption. Rapeseed grown and harvested from this product's treated seed is only for industrial uses and cannot be used for edible oil or any other human/feed consumption.

Wheat, Barley, Oats, Rye, Triticale, Sorghum: Do not graze or feed livestock on treated areas for 45 days after planting.

Cotton (delinted seed only): Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of 0.5 pounds of imidacloprid per acre per cropping cycle.

Stored Seed Protection: Applied at labeled rates equal to or above 0.8 fluid ounce per hundredweight, this product will provide protection to seed against injury from the following insects: Indian Meal Moth (*Plodia interpunctella*), Rice Weevil (*Sitophilus oryzae*), Red Flour Beetle (*Tribolium castaneum*), and Lesser Grain Borer (*Rhizopertha*

dominica). It is recommended that seed with existing populations of stored grain pests be fumigated prior to treating and bagging seed.

For Early Season Protection Against Certain Sucking Insects: This product will aid in the protection of seeds and seedlings against injury by certain early season insects.

Canola, rapeseed, mustard seed: To provide early season protection of seedlings against injury by aphids, flea beetles, and wireworms, apply as a commercial seed treatment at 10.24 to 25.6 fluid ounces per hundredweight of seed. In areas where flea beetles and foliar insects are in high numbers, the higher application rate is recommended. Please consult your local agricultural office for pest patterns, history, and forecasts to assist in determining the appropriate rate for your region.

For suppression of Lygus bugs, including *lygus spp.* In their second generation and cabbage Seedpod Weevil larvae, including *Ceutorhynchus assimilis*, apply 15.36 to 25.6 fluid ounces per hundredweight of seed.

Canola, rapeseed, mustard seed: For End-Use Application at Agricultural Establishments: Apply using an HCBT or a Batch Treater. Shake this product thoroughly before use. Apply 5.1 to 12.8 fluid ounces of this product per 50 pound bag. This product may be diluted with an approved Helena Chemical Company fungicide mixture for extended disease protection. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

Field Corn: For the protection of corn plants from the corn insect pests below, apply as a seed treatment at the specified rates listed.

PEST	HELECLOPRID SEED TREATMENT	
	MG.AI PER KERNEL	FLUID OUNCES PER 80,000 UNITS OF SEED
Corn root worm (including Northern, Western, Southern, and Mexican ¹) Flea beetle Chinch bug Southern green stinkbug White grub Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant South corn leaf beetle Billbug ² Grape colaspis ² Black cutworms ³	1.34	6.0

PEST	HELECLOPRID SEED TREATMENT	
	MG.AI PER KERNEL	FLUID OUNCES PER 80,000 UNITS OF SEED
Flea beetle Chinch bug Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Grape colaspis ² White grub	0.60	2.70

PEST	HELECLOPRID SEED TREATMENT	
	MG.AI PER KERNEL	FLUID OUNCES PER 80,000 UNITS OF SEED
Seed corn maggot (seed protection only) Wireworm(seed protection only) Flea beetle (through 1 leaf stage) Imported fire ant White grub ⁴	0.16	0.72

¹In areas of heavy to severe corn rootworm populations, protection will not be adequate. Use only in areas of light to moderate corn rootworm populations. Consult your State Agricultural Extension Service on levels of corn rootworm populations.

²Reduces early season feeding damage.

³Will reduce feeding damage caused by leaf feeding black cutworms that are ½ inch or less in length.

⁴Reduces feeding damage during emergence and seedling stages.

Field Corn: For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute this product with water and/or an approved Helena Chemical Company fungicide mixture. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50 pound bag of seed. Treat one-half of slurry mix. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50 pound bag of seed following the product application and allow it to distribute evenly on the seed.

Wheat, Barley, Oats, Rye, Triticale: To provide early season protection of seedlings against injury by aphids, (including Bird cherry-oat, English grain, Greenbug and Russian wheat aphid), Hessian fly, apply 0.8 to 2.4 fluid ounces per hundredweight of seed prior to planting as a slurry treatment. For low use rate for "wireworm-only" protection; use this product applied at the 0.13 to 0.26 fluid ounce per hundredweight of

seed offers suppression of wireworm activity on seed and young seedlings. To provide early season protection from grasshopper damage, this product should be applied to seed at 1.2 to 2.4 fluid ounces per hundredweight. To reduce early season damage caused by grasshopper, this product's treated seed may be planted as a 50 to 60 foot border around the edges of the field. Consult your local university extension entomologist for details regarding grasshopper control in your area. For maximum effectiveness, seed should be treated uniformly. Use the higher rate to provide increase length of protection and from heavy insect pressure and from wireworms, and to reduce potential spread of Barley yellow dwarf virus due to aphid vectors. Do not graze or feed livestock on treated areas for 45 days after planting.

Wheat, Barley, Oats, Rye, Triticale: For End-Use Application at Agricultural Establishments: Apply using a Total Slurry Treater (TST), Farmer Applied Seed Treater (F.A.S.T.), Farmer Air Pressure System (FAP) or other on-farm seed treating equipment to deliver accurate rates of this product to achieve optimum product performance. Apply 0.8 to 2.4 fluid ounces per hundredweight of seed. This product should be combined with a Helena Chemical Company fungicide product for seed and seedling protection against fungal pathogens as well as insect pests. Dilution with water may be necessary depending on fungicide formulations used. This product may also be applied on-farm as an over-treatment to seed pretreated with a fungicide. In this case, dilution is necessary. Do not graze or feed livestock on treated areas for 45 days after planting.

Sorghum: To provide early season protection of seedlings against injury by Aphids (including Corn leaf, English grain, Greenbug, and Yellow sugar cane aphid), Chinch bugs, Fire ants and Wireworms, apply 6.4 fluid ounces per hundredweight of seed prior to planting as a slurry treatment. Ensure thorough coverage. Do not graze or feed livestock on treated areas for 45 days after planting.

Sorghum: For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute 3.2 fluid ounces of this product with water. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50 pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50 pound bag of seed following the product application and allow it to distribute evenly on the seed. Do not graze or feed livestock on treated areas for 45 days after planting.

Cotton (Delinted Seed Only): To provide protection of seedlings against injury by early season thrips and aphids, and where the specific application rate is desired on an individual seed basis, apply at 0.375 mg. ai per seed (do not apply more than 12.8 fluid ounces per hundredweight of seed) prior to planting as a slurry treatment so as to ensure thorough coverage. Otherwise, apply at 12.8 fluid ounces per hundredweight of seed. Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of 0.5 pounds of imidacloprid per acre per cropping cycle.

Cotton (Delinted Seed Only): For End-Use Application at Agricultural

Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute 6.4 fluid ounces of this product with water or a ready-to-use fungicide mixture, such as RTU-vitavax-Thiram or ALLEGIANCE-FL, for each 50-pounds bag of cottonseed to be treated. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50 pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

Sugar Beets: To provide early season protection of seedling against injury by Whitefly, Aphids, Leafhoppers (including to reduce potential for spread of Curly top and Yellow mosaic virus due to aphid and leafhopper vectors), Root aphids, Thrips and Wireworms, apply as a commercial seed treatment at 2.4 to 5.0 fluid ounces of this product in or on a unit of pelleted sugar beet seed with a weight ratio of 2:1 pelleting mixture to raw seed (seed count 100,000 seed – approximately 1 kilogram by weight) at a rate of 2.4 fluid ounces per unit of seed. If rates exceed 2.4 fluid ounces per unit, seed must be pelleted.

Sweet Corn: For the protection of sweet corn plants from the insect pests listed below, apply as a seed treatment at the specified rates listed.

PEST	HELECLOPRID SEED TREATMENT FLUID OUNCES/CWT. OF SEED
Flea beetle Early season corn leaf aphid Seed corn maggot Wireworm	6.4
Imported fire ant Early season corn leaf aphid Seed corn maggot Wireworm	3.2 to 6.4
Imported fire ant Seed corn maggot (seed protection) Wireworm(seed protection)	1.6 to 3.2
Wireworm(seed protection)	0.8 to 1.6

The final slurry rate should be adjusted to apply a rate of 16 to 20 fluid ounces of diluted solution per hundredweight of seed with commercial equipment.

Popcorn: To provide early season protection of seedlings against injury by flea beetles, apply as a commercial seed treatment at 6.4 fluid ounces per hundredweight of seed.

Soybean: For protection of planted seeds from damage caused by seed corn maggot, to reduce feeding damage caused by soybean aphids and over-wintering bean leaf beetles, and to help suppress the spread of certain viruses, apply 1.6 to 3.2 fluid ounces per hundredweight of seed. Use higher rate to provide increased length of protection

and for heavy insect pressure. This product can be used as an overtreatment. Do not graze or feed livestock or soybean forage or hay.

Adjuki bean, Asparagus Bean, Broad Bean (Succulent or Dry), Catjang Bean, Chinese Longbean, Field Bean, Guar Bean, Jackbean, Kidney Bean, Labtab Bean, Lima Bean (succulent or Dry), Moth Bean (Succulent or Dry), Mung Bean, Navy Bean, Pinto Bean, Rice Bean, Runner Bean, Snap Bean, Sword Bean, Tepary Bean, Urd Bean, Wax Bean, Yardlong Bean, Blackeyed Pea (Succulent or Dry), Chickpea, Cowpea (Succulent or Dry), Crowder Pea, Dwarf Pea, Edible-Pod Pea, English Pea, Field Pea, Garden Pea, Preen Pea, Pigeon Pea (Succulent or Dry), Snow Pea, Southern Pea (Succulent or Dry), Southern Pea (Succulent or Dry), Sugar Snap Pea, Grain Lupin, Sweet Lupin, White Lupin, White Sweet Lupin, Lentil*: To provide early season protection of seedlings against injury by wireworm, bean leaf beetle, imported fire ant and aphid, apply as a commercial seed treatment at 1.6 to 3.2 fluid ounces per hundredweight of seed prior to planting.

***Seed-and-pod vegetable seed treated in California must be destined for planting in states other than California and is not to be planted in California.**

Carrot: To provide early season protection of seedlings against injury by seed corn maggot and wireworm, apply as a commercial seed treatment at 6.4 fluid ounces per hundredweight of seed.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage: Store in a cool place. Do not store in direct sunlight. Protection from freezing temperatures.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container (Equal to or less than 5 gallons). Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Nonrefillable container (Greater than 5 gallons). Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or

a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling, if available.

Refillable Container: Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

CONDITIONS OF SALE - LIMITED WARRANTY AND LIMITATIONS OF LIABILITY AND REMEDIES

Read the Conditions of Sale - Warranty and Limitations of Liability and Remedies before using this product. If the terms are not acceptable, return the product, unopened, and the full purchase price will be refunded.

The directions on this label are believed to be reliable and must be followed carefully. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions or the failure to follow the label directions or good application practices, all of which are beyond the control of Helena Chemical Company (the "Company") or seller. In addition, failure to follow label directions may cause injury to crops, animals, man or the environment. The Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions for use subject to the factors noted above which are beyond the control of the Company. To the extent consistent with applicable law, the Company makes no other warranties or representations of any kind express or implied, concerning the product, including no implied warranty of merchantability or fitness for any particular purpose, and no such warranty shall be implied by law.

To the extent consistent with applicable law, the exclusive remedy against the Company for any cause of action relating to the handling or use of this product shall be limited to, at Helena Chemical Company's election, one of the following:

1. Refund of the purchase price paid by buyer or user for product bought, or
2. Replacement of the product used

To the extent consistent with applicable law, the Company shall not be liable and any and all claims against the Company are waived for special, indirect, incidental, or consequential damages or expense of any nature, including, but not limited to, loss of profits or income. The Company and the seller offer this product and the buyer and use accept it, subject to the foregoing conditions of sale and limitation of warranty, liability, and remedies.

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HELENA CHEMICAL COMPANY

225 Schilling Blvd., Suite 300
Collierville, Tennessee 38017
Phone: (901) 761-0050

May 3, 2010

US Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Ave. NW
Washington, D.C. 20460

Re: Designation of Agent for:
Helena Chemical Company (EPA Company no. 5905)
664 Moore Road
Memphis, TN 38120

Dear Sir or Madam:

This letter serves as notification that our company has appointed Wagner Regulatory Associates, Inc. ("WRA") to serve as Agent on our company's behalf regarding US EPA regulatory matters relative to Helena's existing registered products, products pending registration and future registration applications. WRA is based at 7460 Lancaster Pike, Suite 9, Hockessin, Delaware 19707.

Helena requests the EPA to accept registration submissions and inquiries from WRA for Helena products and authorizes the EPA to provide registration correspondence to WRA for Helena products.

Thank you for your time and assistance. Please feel free to call me at if you have any questions. This appointment will remain in effect until such time as it is revoked in writing by Helena.

Respectfully submitted,

A handwritten signature in cursive script that reads "Dave Thomas".

Dave Thomas
Vice President - Marketing

cc: WRA Inc.

14-2-2

MATERIAL TO BE ADDED TO JACKET

REG #

5905-577

Description:

Primary Brand Name Helaclopid

check all that apply		
<input type="checkbox"/>	new stamped accepted label	Send to CSC
<input type="checkbox"/>	new CSF	
<input checked="" type="checkbox"/>	notification	

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's
Name:

Joyce M. Edwards
308-5479

Date:

3/28/08

Phone:

Division:

RD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Scot A. Pace
Manager, Registration
Helena Chemical Company
225 Schiling Boulevard, Suite 300
Collierville, TN 38017

MAR 28 2008

RE: Notification for Primary Brand Name Change to Helacloprid
EPA Registration Number: 5905-577
Date of Submission: February 8, 2008

Dear Mr. Pace:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated February 8, 2008, for the product Helecloprid Seed Treatment. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

A handwritten signature in dark ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5905-577	2. EPA Product Manager VENUS EAGLE	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HELECLOPRID SEED TREATMENT	PM#	
5. Name and Address of Applicant (Include ZIP Code) Helena Chemical Company 225 Schilling Boulevard, Suite 300 Collierville, Tennessee 38017 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

"Primary Brand Name Change" to "HELACLOPRID"
Alternate Brand Name

Notification of Alternate Brand Name per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2x2.5, 4x1, 30, 55, & Bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On Label	
6. Manner in Which Label is Affixed to Product Self Adhesive <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____					

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Scott A. Pace		Title Manager: Product Registration		Telephone No. (Include Area Code) (901) 752-4410	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Manager: Registration			
4. Typed Name Scott A. Pace		5. Date 2/08/2008			

Paperwork Reduction Act Notice and Instructions

Paperwork Reduction Act Notice: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, D.C. 20460.

Instructions: This form is to be used for all applications for new registration, end use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

Specific Instructions: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

Section I - This section must be completed, as applicable, for all registration actions.

1. Company/Product Number - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. EPA Product Manager - If known, fill in the name and PM number of the EPA Product Manager.
3. Proposed Classification - Specify the proposed classification of this product.
4. Product Name - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. Name and Address of Applicant - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from the party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. Expedited Review - FIFRA section 3(c) 3(b) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar, or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

Section II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. Subject of submission - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by . . ."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

Section III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. Type of Packaging - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. Type of Retail Container - Indicate type of container in which product will be marketed.
3. Location of Net Contents - Indicate the location of the net contents information for your product.
4. Size(s) of Retail Container - Specify the net contents of all retail containers for your product.
5. Location of the Use Directions - Indicate the location of the use directions for your product.
6. Manner in which label is affixed to product - Indicate the method product label is attached to retail container.

Section IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory
6. EPA Use only



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5905-577	2. EPA Product Manager VENUS EAGLE	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HELECLOPRID SEED TREATMENT	PM#	
5. Name and Address of Applicant (Include ZIP Code) Helena Chemical Company 225 Schilling Boulevard, Suite 300 Collierville, Tennessee 38017 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

"Primary Brand Name Change" to "HELACLOPRID"
Alternate Brand Name

Notification of Alternate Brand Name per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2x2.5, 4x1, 30, 55, & Bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On Label	
6. Manner in Which Label is Affixed to Product Self Adhesive <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____					

Section - IV

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Name Scott A. Pace		Title Manager: Product Registration	
		Telephone No. (Include Area Code) (901) 752-4410	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Manager: Registration	
4. Typed Name Scott A. Pace		5. Date 2/08/2008	

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3. Proposed Classification - Specify the proposed classification of this product.
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Section II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

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Section IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory
6. EPA Use only



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5905-577	2. EPA Product Manager VENUS EAGLE	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HELECLOPRID SEED TREATMENT	PM#	
5. Name and Address of Applicant (Include ZIP Code) Helena Chemical Company 225 Schilling Boulevard, Suite 300 Collierville, Tennessee 38017 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

" Primary Brand Name Change" to "HELACLOPRID"

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2x2.5, 4x1, 30, 55, & Bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On Label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input checked="" type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Scott A. Pace		Title Manager:Product Registration	
		Telephone No. (Include Area Code) (901) 752-4410	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Manager: Registration	
4. Typed Name Scott A. Pace		5. Date 2/08/2008	



HELENA CHEMICAL COMPANY

225 Schilling Blvd., Suite 300
Collierville, Tennessee 38017
Telephone: 901-761-0050

Feb. 8, 2008

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive Room S-4900
Arlington, VA 22202

RE:

EPA Reg. No. 5905-577
Primary Brand Name Change

Dear Ms. Arrington:

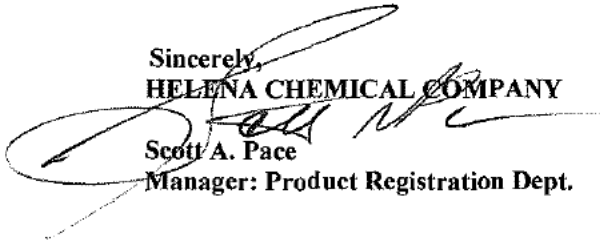
This letter is designed to submit to you via Notification as outlined in PR Notice 98-10 Helena Chemical Company's request that the primary brand name for our product Helecloprid Seed Treatment EPA Reg # 5950-577 be change to "Helacloprid" Seed Treatment. Appropriate certification is attached hereto.

In support of this action, I have enclosed the following

EPA Form 8570-1 Application for Registration
2 copies of Draft Labeling Bearing the Alternate Brand Name

If there are any questions about this submission, please contact me at 901-752-4410. Thank you for your attention to and assistance with this matter.

Sincerely,
HELENA CHEMICAL COMPANY


Scott A. Pace
Manager: Product Registration Dept.

/Enclosures

1A-2,2

MATERIAL TO BE ADDED TO JACKET

REG #

5905-577

Description:

Primary Brand Name

check all that apply	
<input type="checkbox"/>	new stamped accepted label
<input type="checkbox"/>	new CSF
<input checked="" type="checkbox"/>	notification

Send to CSC

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's
Name:Joyce M. Edwards
308-5479

Date:

3-13-08
~~3-13-08~~

Phone:

Division:

RD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Scott A. Pace
Product Registration
Helena Chemical Company
225 Schilling Blvd. , Suite 300
Collierville, TN 38017

MAR 13 2008

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request Primary Brand Name "Helacloprid Seed Treatment"
EPA Reg. No.5905-577
Application Dated February 8., 2008

Dear Mr. Pace:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 02/08/08 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5905-577	2. EPA Product Manager VENUS EAGLE	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HELECLOPRID SEED TREATMENT	PM#	
5. Name and Address of Applicant (Include ZIP Code) Helena Chemical Company 225 Schilling Boulevard, Suite 300 Collierville, Tennessee 38017 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION NOTIFICATION MAR 13 2008
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

"Primary Brand Name Change" to "HELACLOPRID"

COPY

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 2x2.5, 4x1, 30, 55, & Bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On Label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Scott A. Pace		Title Manager:Product Registration		Telephone No. (Include Area Code) (901) 752-4410	
<p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>					
2. Signature 		3. Title Manager: Registration		6. Date Application Received (Stamped)	
4. Typed Name Scott A. Pace		5. Date 2/08/2008			

Helacloprid™

NOTIFICATION

MAR 13 2008

ACTIVE INGREDIENT:

Imidacloprid.....48.7%

OTHER INGREDIENTS:.....51.3%

TOTAL.....100.0%

*Contains 5 pounds active per gallon (600 grams per liter)

KEEP OUT OF REACH OF CHILDREN

CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See Inside for Additional Precautionary Statements. Read the entire label before using this product. Use only according to label instructions.

EPA Reg. No. 5905-577

Net Contents_____

**MANUFACTURED FOR
HELENA CHEMICAL COMPANY
225 SCHILLING BOULEVARD, SUITE 300
COLLIERVILLE, TN 38017**

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Caution: Harmful if inhaled. Harmful if swallowed. Avoid breathing spray mist. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Avoid contact with eyes or clothing. Wear protective eyewear, long-sleeved shirt and long pants, socks, shoes and chemical-resistant gloves made of waterproof material such as polyethylene, polyvinylchloride (PVC) or viton.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category C on an EPA chemical resistance category selection chart.

Applicators and other handlers must wear: long-sleeved shirt and long pants, socks, shoes, protective eyewear and chemical-resistant gloves (such as nitrile, butyl, neoprene, barrier laminate, polyvinyl chloride or Viton). Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE Separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- * Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- * Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- * Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

FIRST AID

IF INHALED

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

IF SWALLOWED

- Call poison control center or doctor immediately for treatment advice
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF IN EYES

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact (800) 424-9300, collect day or night, for emergency medical treatment information.

ENVIRONMENTAL HAZARDS

This product is highly toxic to birds and aquatic invertebrates. For terrestrial uses, do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters. Cover or incorporate spilled treated seeds.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

For use in commercial seed treaters only, with the exception of application to canola, cotton (delinted seed), field corn, sorghum, wheat and barley, which may be made either by commercial seed treatment or as an end-use seed treatment on agricultural establishments at, or immediately before, planting. This product is to be used in liquid or slurry treaters.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulations.

Mix thoroughly before use or use entire container at one time. All tank mixes should be pre-tested to determine physical compatibility between formulations. Observe all cautions and limitations on labeling of all products used in mixtures.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted entry interval and notification to workers (as applicable). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

Exception: If the seed is treated with the product and the treated seed is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated. PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

Coveralls

Chemical-resistant gloves made of any waterproof material such as, barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

Shoes plus socks

Protective eyewear

ROTATIONAL CROPS

Treated areas may be replanted with any crop specified on an Imidacloprid label, or any crop for which a tolerance exists for the active ingredient, as soon as practical following the last application. The following plant-back should be observed for listed crops:

ROTATIONAL PLANT-BACK INTERVALS*

ROTATIONAL PLANT-BACK INTERVALS*				
IMMEDIATE PLANT-BACK				30-DAY PLANT-BACK
Artichoke	Eggplant	Oats	Sugarbeet	Cereals including: buckwheat millet rice Safflower
Barley	Ground cherry	Okra	Tomatilo	
Brassica (cole)	Leaf petiole	Pepinos	Tomato	
leafy vegetable	vegetable	Pepper	Triticale	
Canola	Leafy vegetable	Popcorn	Veg. Root and	
Cilantro	Legume	Potato	Tuber	
Corn, Field	vegetable	Rapeseed	Watercress	
Corn, Sweet	(succulent or	Rye	Wheat	
Cotton	dried, except	Sorghum		
Cranberry	soybean)	Soybean		
Cucurbits	Mustard Seed	Strawberry		
*Cover crops for soil building or erosion control may be planted any time, but do not graze or harvest for food or feed.				
*For all other crops not listed on an Imidacloprid label, or for crops for which no tolerance for the active ingredient has been established, a 12-month plant-back interval should be observed.				

NOTIFICATION of the crop rotational restriction must be conveyed to the grower by appropriate seed tag labeling or bag printing on all seed units.

NOTE: The purchaser of this product is responsible for ensuring that all seed treated with this product are adequately dyed with a suitable color to prevent its accidental use as food for man or feed for animals. Refer to 21 CFR, Part 2.25. Any dye or colorant added to treated seed must be cleared for use under 40 CFR, Part 180.1001. Federal regulations have

established official tolerances for certain pesticide residues. In order that residues on food and forage crops will not exceed established tolerances, use only at recommended rates.

Treated seed must not be used for or mixed with food or animal feed or processed for oil. Seed commercially treated with this product must be labeled in accordance with all applicable requirements of the Federal Seed Act.

Labels for commercially treated seed should include the following addition to the Environmental Hazards statements:

Exposed treated seed may be hazardous to birds. Dispose of all excess treated seed and seed packaging by burial away from bodies of water. Cover or incorporate spilled treated seeds.

USE RESTRICTION

Rape greens grown and harvested from this product's treated seed must not be used for human and feed consumption. Rapeseed grown and harvested from this product's treated seed is only for industrial uses and can not be used for edible oil or any other human/feed consumption.

Wheat, Barley, Oats, Rye Triticale, and Sorghum: Do not graze or feed livestock on treated areas for 45 days after planting.

Cotton (delinted seed only): Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of 0.5 pound of Imidacloprid per acre per cropping cycle.

Stored Seed Protection: Applied at labeled rates equal to or above 0.8 fluid ounce per hundredweight, this product will provide protection to seed against injury from the following insects: Indian Meal Moth (*Plodia interpunctella*), Rice Weevil (*Sitophilus oryzae*), Red Flour Beetle (*Tribolium castaneum*), and Lesser Grain Borer (*Rhizopertha dominica*). It is recommended that seed with existing populations of stored grain pests be fumigated prior to treating and bagging seed.

For Early Season Protection Against Certain Sucking Insects: This product will aid in the protection of seeds and seedlings against injury by certain early season insects.

Canola, rapeseed, and mustard seed: To provide early season protection of seedlings against injury by aphids, flea beetles and wireworms apply as a commercial seed treatment at 10.24 to 25.6 fluid ounces per hundredweight of seed. In areas where flea beetles and foliar insects are in high numbers, the higher application rate is recommended. Please consult your local agricultural office for pest patterns, history, and forecasts to assist in determining the appropriate rate for your region.

For suppression of Lygus bugs, including *lygus spp.*, in their second generation and cabbage Seedpod Weevil larvae, including *Ceutorhynchus assimilis*, apply 15.36 to 25.6 fluid ounces per hundredweight of seed.

Canola, rapeseed, and mustard seed: For End-Use Application at Agricultural Establishments: Apply using an HCBT or a Batch Treater. Shake this product thoroughly before use. Apply 5.1 to 12.8 fluid ounces of this product per 50 pound bag. This product may be diluted with an approved Helena Chemical Company fungicide mixture for extended disease protection. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

Field Corn: For the protection of corn plants from the corn insect pests listed below, apply as a seed treatment at the recommended rates listed.

PEST	THIS PRODUCT	
	MG.AI PER KERNEL	FLUID OUNCES PER 80,000 UNITS OF SEED
Corn root worm (including Northern, Western Southern and Mexican ¹) Flea beetle Chinch bug Southern green stinkbug White grub Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Southern corn leaf beetle Billbug ² Grape colaspis ² Black curworms ³	1.34	6.0

PEST	THIS PRODUCT	
	MG.AI PER KERNEL	FLUID OUNCES PER 80,000 UNITS OF SEED
Flea beetle Chinch bug Seed corn maggot Thrips Wireworm Corn leaf aphid Imported fire ant Grape Colaspis ² White grub	0.60	2.70

PEST	THIS PRODUCT	
	MG.AI PER KERNEL	FLUID OUNCES PER 80,000 UNITS OF SEED
Seed corn maggot (seed protection only) Wireworm (seed protection only) Flea beetle (through 1 leaf stage) Imported fire ant White grub ⁴	0.16	0.72

1) In areas of heavy to severe corn rootworm populations, protection will not be adequate. Use only in areas of light to moderate corn rootworm populations. Consult your State Agricultural Extension Service on levels of corn rootworm populations.

2) Reduces early season feeding damage.

3) Will reduce feeding damage caused by leaf feeding black cutworms that are ½ inch or less in length.

4) Reduces feeding damage during emergence and seedling stages.

Field Corn		For End-Use Application at Agricultural Establishments:	Rate Per 50 lb Bag of Seed Corn
			Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute this product with water and/or an approved Helena Chemical Company fungicide mixture. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50 pound bag of seed. Treat one-half of slurry mix. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50 pound bag of seed following the product application and allow it to distribute evenly on the seed.
CROP	PEST	RATE (fluid ounces per hundredweight seed)	COMMENT
Wheat, Barley, Oats, Rye, Triticale	Aphids (including Bird cherry-oat, English grain, Greenbug, and Russian wheat aphid), Hessian fly	0.8 to .24	Reduces possible yellow dwarf virus disease from aphid vectoring. Use the higher rate to increase time of protection and/or when insect pressure is heavy.
	Wireworm	0.13 - 0.26	Suppression only. Use the higher rate to increase time of protection and/or when insect pressure is heavy
	Grasshopper	1.2 to 2.4	Treated seed may be planted as a 50 to 60 foot border around the perimeter of the field to help minimize early season damage from grasshoppers. Consult your local agricultural extension agent for grasshopper control information specific to your area. Use the higher rate to increase time of protection and/or when insect pressure is heavy.

Wheat, Barley, Oats, Triticale: (For End-Use Application at Agricultural Establishments):

Application Instructions: Make application using a Total Slurry Treater (TST), Farmer Applied Seed Treater (F.A.S.T.), or other on- farm seed treating equipment capable of accurately applying low rates of Helacloprid, Apply 0.8 — 2.4 fl. oz. per hundredweight of seed. HELACLOPRID may be mixed with a fungicide product for protection against disease. HELACLOPRID may be applied to seed previously treated with a fungicide. In this case, dilution is necessary.

Note: Do not graze or feed livestock on treated areas for 45 days after planting.

CROP	PEST	RATE (fluid ounces per hundredweight seed)	COMMENT
Sorghum:	Aphids (including Corn leaf, English grain, Greenbug, and Yellow sugar cane aphid), Chinch bugs, Fire ants and Wireworms	6.4 fluid ounces	To provide early season protection of seedlings against injury prior to planting as a slurry treatment. Thorough coverage is necessary for optimal control.

Note and Restrictions: Do not graze or feed livestock on treated areas for 45 days after planting.

Sorghum: For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute 3.2 fluid ounces of this product with water. The final slurry rate should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered. Apply 0.75 ounce of dry TALC per 50-pound bag of seed following the product application and allow it to distribute evenly on the seed.

Note: Do not graze or feed livestock on treated areas for 45 days after planting.

CROP	PEST	RATE (fluid ounces per hundredweight seed)	COMMENT
Cotton (Delinted Seed Only)	Thrips Aphids	12.8 fluid (Equivalent to 0.375 mg a.i. per seed)	To provide protection of seedlings against injury by early season Thrips and aphids, and where the specific application rate is desired on an individual seed basis.

Note and Restriction. Regardless of the type of application (seed treatment, soil or foliar) do not apply more than a total of 0.5 pound of Helacloprid per acre per cropping cycle.

Cotton (Delinted Seed Only): For End-Use Application at Agricultural Establishments: Apply using an HCBT or an Eight-Bag Batch Treater. Shake this product thoroughly before use. Dilute 6.4 fluid ounces of this product with water or a ready-to-use fungicide mixture, such as RTU-VITAVAX-Thiram or ALLEGIANCE-FL, for each 50-pound bag of cottonseed to be treated. The final slurry should be adjusted to apply a rate of 8 to 10 fluid ounces of diluted slurry per 50-pound bag of seed. Treat one-half of seed with one-half of slurry mix. Add the balance of the seed and apply balance of slurry. Allow mixing until seed is thoroughly covered.

CROP	PEST	RATE (fluid ounces per seed unit) (1)	COMMENT
Sugar Beets (commercial seed treatment)	Whitefly, Aphids (2) Leafhoppers, (2) Root aphids, Thrips and Wireworm	2.4-5.0	To provide early season protection of seedlings against injury by Whitefly, Aphids, Leafhoppers (including to reduce potential for spread of Curly top and Yellow mosaic virus due to aphid and leafhopper vectors), Root aphids, Thrips and Wireworms, apply as a commercial seed treatment

Notes and Restrictions:

- (1) Use on a unit of pelleted sugar beet seed with a weight ratio of 2:1 pelleting mixture to raw seed (seed count 100,000 seed - approximately 1 kilogram by weight) at rate of 2.4 fluid ounces per unit of seed.
- (2) If applying to non-pelleted raw seed, do not exceed 2.4 fluid ounces per 100,000 seeds (approx. 1 kg by weight). If rates exceed 2.4 fluid ounces per unit, seed must be pelleted.

Sweet Corn: For the protection of sweet corn plants from the insect pests listed below, apply as a seed treatment at the recommended rates listed.

PEST	PRODUCT FLUID OUNCES/ CWT. OF SEED
Flea beetle Early season corn leaf aphid Seed corn maggot Wireworm	6.4
Imported fire ant Early season corn leaf aphid Seed corn maggot Wireworm	3.2 to 6.4
Imported fire ant Seed corn maggot (seed protection) Wireworm (seed protection)	1.6 to 3.2
Wireworm (seed protection)	0.8 to 1.6

NOTE: The final slurry rate should be adjusted to apply a rate of 16 to 20 fluid ounces of diluted solution per hundredweight of seed with commercial equipment.

Popcorn: To provide early season protection of seedlings against injury by flea beetles, apply as a commercial seed treatment at 6.4 fluid ounces per hundredweight of seed.

CROP	PEST	RATE (fluid ounces per hundredweight seed)	COMMENT
Soybean	seed corn maggot soybean aphids over-wintering bean leaf beetles	1.6 to 3.2	For protection of planted seeds from damage caused by seed corn maggot, to reduce feeding damage caused by soybean aphids and over- wintering bean leaf beetles, and to help suppress the spread of certain viruses. Use higher rates to provide increased length of protection and for heavy insect pressure.

Notes and Restrictions:

- This product can be used as an overtreatment
- Do not graze or feed livestock on soybean forage or hay.

CROP	PEST	RATE (fluid ounces per hundredweight seed)	COMMENT
Adzuki Bean, Asparagus Bean, Broad Bean (Succulent or Dry), Catjang Bean, Chinse Longbean, Field Bean, Guar Bean, Jackbean, Kidney Bean Labtab Bean, Lima Bean (Succulent or Dry), Moth Bean (Succulent or Dry), Mung Bean, Navy Mean, Pinto Bean, Rice Bean, Runner Bean, Snap Bean Sword Bean, Tepary Bean, Urd Bean, Wax Bean, Yardlong Bean, Blackeyed Pea (Succulent or Dry), Chickpea, Cowpea	Wireworm, Bean leaf beetle, Imported fire ant and Aphid	1.6 to 3.2	To provide early season protection of seedlings against injury by wireworm, bean leaf beetle, imported fire ant and aphid, apply as a commercial seed treatment. Seed-and-pod vegetable seed treated in California must be destined for planting in states other than California. * and is not to be planted in California.

(Succulent or Dry), Crowder Pea, Dwarf Pea, Edible-Pod Pea, English Pea, Field Pea, Garden Pea, Preen Pea, Pigeon Pea (Succulent or Dry), Snow Pea, Southern Pea (Succulent or Dry), Southern Pea (Succulent or Dry), Sugar Snap Pea, Grain Lupin, Sweet Lupin, White Lupin, White Sweet Lupin, Lentil:*			
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CROP	PEST	RATE (fluid ounces per hundredweight seed)	COMMENT
Carrot	Seed corn maggot and wireworm	6.4 fluid	To provide early season protection of seedlings against injury by seed corn maggot and wireworm, apply as a commercial seed treatment

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool place. Do not store in direct sunlight. Protect from freezing temperatures.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

CONDITIONS OF SALE-LIMITED WARRANTY AND LIMITATION OF LIABILITY AND REMEDIES

Read the Conditions of Sale - Warranty and Limitations of Liability and Remedies before using this product. If the terms are not acceptable, return the product, unopened, and the full purchase price will be refunded.

The directions on this label are believed to be reliable and must be followed carefully. Insufficient control of pests and/or injury to the crop to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions or the failure to follow the label directions or good application practices, all of which are beyond the control of Helena Chemical Company (the "Company") or seller. In addition, failure to follow label directions may cause injury to crops, animals, man or the environment. The Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose referred to in the directions for use subject to the factors noted above which are beyond the control of the Company. To the extent consistent with applicable law, the Company makes no other warranties or representations of any kind express or implied, concerning the product, including no implied warranty of merchantability or fitness for any particular purpose, and no such warranty shall be implied by law.

The exclusive remedy against the Company for any cause of action relating to the handling or use of this product shall be limited to, at Helena Chemical Company's election, one of the following:

1. Refund of the purchase price paid by buyer or user for product bought, or
2. Replacement of the product used

To the extent consistent with applicable law, the Company shall not be liable and any and all claims against the Company are waived for special, indirect, incidental, or consequential damages or expense of any nature, including, but not limited to, loss of profits or income. The Company and the seller offer this product and the buyer and user accept it, subject to the foregoing conditions of sale and limitation of warranty, liability and remedies.

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HELENA CHEMICAL COMPANY
225 Schilling Blvd., Suite 300
Collierville, Tennessee 38017
Telephone: 901-761-0050

COPY

Feb. 8, 2008

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive Room S-4900
Arlington, VA 22202

RE:

EPA Reg. No. 5905-577
Primary Brand Name Change

Dear Ms. Arrington:

This letter is designed to submit to you via Notification as outlined in PR Notice 98-10 Helena Chemical Company's request that the primary brand name for our product Helecloprid Seed Treatment EPA Reg # 5950-577 be change to "Helacloprid" Seed Treatment. Appropriate certification is attached hereto.

In support of this action, I have enclosed the following

EPA Form 8570-1 Application for Registration
2 copies of Draft Labeling Bearing the Alternate Brand Name

If there are any questions about this submission, please contact me at 901-752-4410. Thank you for your attention to and assistance with this matter.

Sincerely,
HELENA CHEMICAL COMPANY


Scott A. Pace
Manager: Product Registration Dept.

/Enclosures



HELENA CHEMICAL COMPANY

225 Schilling Blvd., Suite 300
Collierville, Tennessee 38017
Telephone: 901-761-0050

Feb. 11, 2008

Mr. Kable Davis
Office of Pesticide Programs
Registration Division (7505P)
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive Room S-4900
Arlington, VA 22202

RE:
EPA Reg. No. 5905-577
Alternate Brand Name

Dear Bo:

Please find enclosed the corrected label as per your instructions in the letter dated January 28, 2008. I have also included a copy of where we sent in Helena Chemical Company's request that the primary brand name for our product Helecloprid Seed Treatment EPA Reg # 5950-577 be change to "Helacloprid" Seed Treatment. Appropriate certification is attached hereto.

I have enclosed the copies of the following:

Primary Brand name change letter (Copy)
EPA Form 8570-1 (Copy) Application for Registration
2 copies of Draft Labeling bearing Helacloprid as Primary Brand Name

If there are any questions about this submission, please contact me at 901-752-4410. Thank you for your attention to and assistance with this matter.

Sincerely,
HELENA CHEMICAL COMPANY

Scott A. Pace
Manager: Product Registration Dept.

/Enclosures

ISB'S Front-end PRIA Completeness Screen

Draft 3; 10/25/07

EPA Receipt Date: NOV 27 2007		EPA Reg. Number: 5905-LTT		
	Check List Item	Yes	No	N/A
1	Has the PRIA Fee been Paid ; is a copy of the check or Pay.gov receipt included in the Submission Package?	X		
2	Is an Application Form (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?	X		
3	Is a Confidential Statement of Formula (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?	X		
4	Is a Formulator's Exemption Statement (EPA Form 8570-27) Included in the Submission Package?	X		
5	Is a Certification with Respect to Citation of Data (EPA Form 8570-34) Included in the Submission Package?	X		
6	Is a Data Matrix (EPA Form 8570-35) Included in the Submission Package?	X		
7	Is a Label Included in the Submission Package?	X		
8	Are Data Included in the Submission Package?	X		
9	Is the Submission an Amendment?		X	

